# EX. PLF B

#### **Deposition Transcript**

Case Number: 1:24-CV-24228-CMA

Date: July 25, 2025

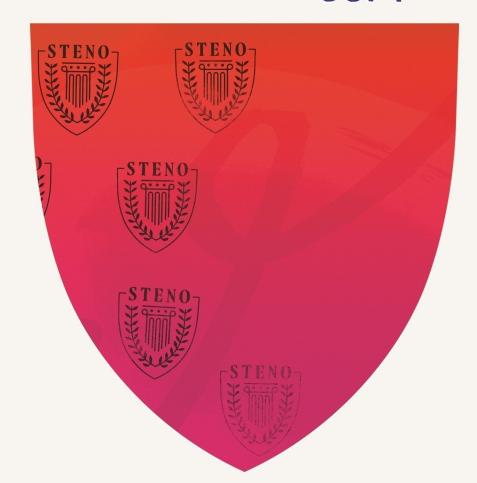
In the matter of:

#### MEGAN PETE v MILAGRO ELIZABETH COOPER

#### **CEASAR MCDOWELL**

# CERTIFIED COPY

Reported by: RONNY ZAVOSKY



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1	UNITED STATES DISTRICT COURT
2	SOUTHERN DISTRICT OF FLORIDA
3	
4	
5	Civil Action No.1:24- CV-24228-CMA
6	MEGAN PETE, an individual,
7	Plaintiff,
8	vs.
9	MILAGRO ELIZABETH COOPER, an individual,
10	Defendant.
11	
12	
13	VIDEOTAPED DEPOSITION OF
14	CEASAR MCDOWELL
15	LOS ANGELES, CALIFORNIA
16	FRIDAY, JULY 25, 2025
17	
18	
19	
20	
21	REPORTED BY: RONNY ZAVOSKY
22	CSR NO. 12359 JOB NO. 1837675
23	00D NO. 103/0/3
24	
25	

CEASAR MCDOWELL JULY 25, 2025

1	The deposition of CEASAR MCDOWELL was taken on
2	behalf of the Plaintiff at 865 South Figueroa Street,
3	10th Floor, Los Angeles California, commencing at
4	10:26 AM on Friday, July 25th, 2025, before
5	Ronny Zavosky, CSR No. 12359.
6	
7	
8	
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10	
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20
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21
     KRYSTAL THRASHER, STENO TECH
2.2
     DENNIS RIVAS, STENO TECH
23
     GABBY TREVINO, PARALEGAL AT QUINN EMANUEL
24
     ARAYA BANNER, LEGAL ASSISTANT FOR MICHAEL HAYDEN
25
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CEASAR MCDOWELL JULY 25, 2025

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	1	FRIDAY, JULY 25, 2025; LOS ANGELES, CALIFORNIA			
	2	10:26 AM			
	3				
10:24:02	4	THE VIDEOGRAPHER: We are now on the record.			
10:26:01	5	My name is Steve Petersen. I am a notary			
10:26:04	6	public contracted by Steno. I am not financially			
10:26:09	7	interested in this action, nor am I a relative or			
10:26:13	8	employee of any of the attorneys or any of the parties.			
10:26:19	9	Today is Friday, July 25th, 2025, and the			
10:26:23	10	time is 10:26 AM Pacific time. This deposition is taken			
10:26:30	11	at 865 South Figueroa Street, Tenth Floor, Los Angeles,			
10:26:36	12	California 90017. The name of the case is Pete versus			
10:26:45	13	Cooper filed in the United States District Court, for			
10:26:49	14	the Southern District of Florida, Case Number			
10:26:53	15	1:24-CV-24228-CMA.			
10:27:05	16	This is the video-recorded deposition of			
10:27:08	17	Ceasar McDowell, Volume I. The attorney taking this			
10:27:13	18	deposition is Marie Hayrapetian.			
10:27:16	19	Would Counsel please identify yourselves and			
10:27:18	20	state who you represent.			
10:27:23	21	MS. HAYRAPETIAN: Good morning. My name is			
10:27:23	22	Marie Hayrapetian. I represent the Plaintiff,			
10:27:26	23	Megan Pete. I am joined by my colleague Bomie Lee and			
10:27:31	24	my colleagues Alanah Harris remotely and our paralegal			
10:27:34	25	Gabby Trevino.			

10:27:39	1	MR. HAYDEN: Good morning. Michael Hayden for
10:27:41	2	the deposed, Ceasar McDowell, as his attorney and
10:27:45	3	attorney of Unite the People Inc. Here with legal
10:27:49	4	assistant Araya Banner Banning. Sorry.
10:27:54	5	MS. DIXON: Hi. Ronda Dixon. And I represent
10:27:57	6	Milagro Cooper.
10:27:59	7	THE VIDEOGRAPHER: We are ready to proceed.
10:28:01	8	The court reporter today is Ronny Zavosky with
10:28:05	9	Steno.
10:28:05	10	Would the reporter please swear in the
10:28:07	11	witness.
10:28:07	12	THE COURT REPORTER: My name is Ronny Zavosky.
10:28:07	13	I am a certified shorthand reporter licensed in the
10:28:07	14	state of California. My license number is 12359.
10:28:07	15	I will now swear in the witness.
10:28:07	16	
10:28:08	17	CEASAR McDOWELL,
10:28:08	18	having first declared under penalty of perjury to tell
10:28:08	19	the truth, was examined and testified as follows:
10:28:36	20	THE WITNESS: Sure.
10:28:36	21	
10:28:36	22	EXAMINATION
10:28:37	23	BY MS. HAYRAPETIAN:
10:28:38	24	Q Good morning. I represent Ms. Megan Pete, and
10:28:43	25	my name is Marie Hayrapetian.

10:28:46	1	Could you please state and spell your name for
10:28:47	2	the full record?
10:28:48	3	A Ceasar.
10:28:49	4	Q Do you have a last name?
10:28:50	5	A Yeah. McDowell.
10:28:51	6	Q And have you ever used any other names?
10:28:53	7	A A lot of them.
10:28:54	8	Q Could you list them out for me.
10:28:56	9	A I can't remember them.
10:28:58	10	This ain't going to go good. You know that;
10:29:00	11	right?
10:29:01	12	MR. HAYDEN: Just answer.
10:29:02	13	THE WITNESS: I did.
10:29:03	14	BY MS. HAYRAPETIAN:
10:29:03	15	Q Could you please list all
10:29:08	16	A No.
10:29:08	17	Q legal names. Could you please list
10:29:13	18	A No.
10:29:17	19	You ever hear of "Great Ape Beegle Beagle"?
10:29:18	20	It's a great cartoon.
10:29:22	21	Q Okay. Let's go off the record. I'm going to
10:29:25	22	get the Judge on the phone because I can already tell
10:29:28	23	this is
10:29:29	24	A not going to go good.
10:29:31	25	THE VIDEOGRAPHER: The time is 10:29 AM

10:29:33	1	Pacific time. We are now off the record.
10:29:44	2	(Recess was taken.)
10:36:34	3	THE VIDEOGRAPHER: The time is 10:36 AM
10:36:40	4	Pacific time. We are back on the record.
10:36:44	5	MS. HAYRAPETIAN: Okay. Hopefully, the mood
10:36:46	6	in the room has shifted since I gave Mr. McDowell a
10:36:50	7	little break to collect himself, and I'm hoping we can
10:36:54	8	get off to a better start now.
10:36:55	9	BY MS. HAYRAPETIAN:
10:36:58	10	Q Have you ever used any other names aside from
10:37:02	11	Ceasar McDowell?
10:37:03	12	A A lot of them.
10:37:04	13	Q How many?
10:37:05	14	A I don't remember.
10:37:05	15	Q Can you name one?
10:37:07	16	A No.
10:37:08	17	Q Why not?
10:37:08	18	A 'Cause I don't remember.
10:37:10	19	Q Okay. Do you frequently forget your own name?
10:37:14	20	A No. I know my name.
10:37:15	21	Q Okay. Do you frequently forget your own
10:37:17	22	nicknames?
10:37:18	23	A They weren't nicknames. You said did I use
10:37:20	24	any names.
10:37:20	25	Q Did you use any names?

10:37:22	1	A	No. I don't remember.
10:37:23	2	Q	Okay. Do you have any nicknames?
10:37:26	3	A	Yeah.
10:37:27	4	Q	What are they?
10:37:28	5	А	The Gooch.
10:37:29	6	Q	The Gooch.
10:37:30	7		What does that mean?
10:37:31	8	А	It was the bully on Arnold.
10:37:33	9	Q	Okay. Do you have any other nicknames?
10:37:36	10	A	Nope.
10:37:37	11	Q	Any aliases?
10:37:39	12		MR. HAYDEN: Objection. Asked and answered.
10:37:41	13	BY MS. HA	YRAPETIAN:
10:37:41	14	Q	Any names used on social media?
10:37:44	15	A	Not that I remember.
10:37:45	16	Q	Okay. Is Mr. Michael Hayden at Unite the
10:37:49	17	People re	presenting you as your attorney in connection
10:37:51	18	with this	deposition?
10:37:53	19	A	Yeah. That's him.
10:37:55	20	Q	Unite the People no longer represents
10:37:56	21	Ms. Coope	r in this litigation; correct?
10:37:59	22	A	I don't know.
10:38:01	23	Q	Have you ever been deposed before?
10:38:04	24	A	I don't remember.
10:38:07	25	Q	Okay. Other than depositions, have you ever

10:38:11	1	testified	under oath in court?
10:38:13	2	А	I don't think so.
10:38:15	3	Q	Have you ever attended a hearing?
10:38:17	4	А	My own.
10:38:18	5	Q	Okay. What hearing was that?
10:38:23	6	А	A few of them.
10:38:26	7	Q	What's the most recent hearing of yours you've
10:38:28	8	attended?	
10:38:30	9	А	Parole board.
10:38:32	10	Q	When was that?
10:38:33	11	А	I don't remember.
10:38:34	12	Q	Okay. And what was the hearing about?
10:38:36	13	А	Parole.
10:38:37	14	Q	Why were you on parole?
10:38:39	15	А	I wasn't on parole when I had the hearing. I
10:38:41	16	was in pr	ison.
10:38:42	17	Q	Okay. What were you in prison for?
10:38:45	18	А	I don't remember.
10:38:48	19	Q	Okay. How long were you in prison?
10:38:50	20	А	I don't really remember.
10:38:50	21		MR. HAYDEN: Objection. Relevance.
10:38:53	22	BY MS. HA	YRAPETIAN:
10:38:54	23	Q	Any other hearings you've attended?
10:38:56	24	А	Nope.
10:38:57	25	Q	And what was the subject matter of the the

10:39:01	1	hearing?	
10:39:06	2	А	I said I didn't attend any other hearings.
10:39:08	3		Which hearings are you referring to?
10:39:10	4	Q	The one you were in prison for.
10:39:12	5	А	The parole board? For parole.
10:39:13	6	Q	Okay. And what were you in prison for?
10:39:15	7		MR. HAYDEN: Objection. Relevance.
10:39:17	8		THE WITNESS: Being Black.
10:39:18	9		Or was I not supposed to answer yet? Okay.
10:39:20	10	Good.	
10:39:22	11		MR. HAYDEN: You can answer.
10:39:22	12		THE WITNESS: Okay.
10:39:22	13	BY MS. HA	YRAPETIAN:
10:39:23	14	Q	Okay. Do you understand you are giving
10:39:25	15	testimony	under oath?
10:39:27	16	А	Yep.
10:39:28	17	Q	Do you understand that you are under the same
10:39:29	18	oath toda	y as if you were testifying in court?
10:39:31	19	А	Yes, ma'am.
10:39:32	20	Q	I will be asking you questions. Sometimes
10:39:33	21	your coun	sel or Ms. Cooper's counsel might object, but
10:39:37	22	you still	need to answer my question.
10:39:39	23		Do you understand?
10:39:40	24	А	I hear you.
10:39:42	25	Q	When lawyers make objections they're usually

10:39:44	1	just preserving them for the record to argue later
10:39:46	2	before the judge. The only time you don't answer a
10:39:48	3	question is if your lawyer specifically instructs you
10:39:52	4	not to answer which happens in limited circumstances.
10:39:54	5	Do you understand?
10:39:55	6	A Not really.
10:39:58	7	Q What don't you understand?
10:39:59	8	A What you just said.
10:40:00	9	Q Okay. So I will ask questions.
10:40:03	10	A Sure.
10:40:03	11	Q Your lawyer may object, but that means that
10:40:06	12	doesn't mean you do not answer my question. You still
10:40:09	13	answer my question, unless he
10:40:11	14	A If I want to answer; right?
10:40:15	15	MR. HAYDEN: Unless I specify instruct the
10:40:17	16	witness not to answer, you don't answer.
10:40:19	17	THE WITNESS: Okay. I understood that.
10:40:21	18	BY MS. HAYRAPETIAN:
10:40:22	19	Q Because the court reporter is transcribing
10:40:25	20	this deposition, it's also important that only one
10:40:28	21	person speak at a time. I ask that you wait until I
10:40:30	22	finish my question before you begin to answer, and I'll
10:40:33	23	do my best to wait for you to finish your answer before
10:40:36	24	I start my next question.
10:40:37	25	Do you understand?

10:40:38	1	А	Yep.
10:40:39	2	Q	If you answer a question, I, and anyone who
10:40:41	3	reads the	deposition transcript, will assume you
10:40:44	4	understood	d the question.
10:40:44	5		Do you understand?
10:40:47	6	A	Yep.
10:40:47	7	Q	So, if you don't not understand a question,
10:40:49	8	please asl	k for clarification. Okay?
10:40:51	9	A	Sure.
10:40:53	10	Q	We can take a break any time except we can't
10:40:58	11	take a bre	eak while a question is pending; so you'll need
10:41:01	12	to answer	any pending question before we take a break.
10:41:05	13		Do you understand?
10:41:05	14	А	Sure.
10:41:06	15	Q	Are you able to put your phone aside?
10:41:07	16	А	Sure.
10:41:08	17	Q	Do you think you could put it facedown a
10:41:13	18	little	away from your reach?
10:41:17	19	А	Are you going to handcuff me too? I can't
10:41:19	20	have my pl	none? You got your phone.
10:41:22	21		MR. HAYDEN: I'll just put mine down too.
10:41:23	22	BY MS. HAY	YRAPETIAN:
10:41:24	23	Q	Have you taken any drugs or medication that
10:41:26	24	could impa	air your ability to hear my questions,
10:41:28	25	understand	d them, and answer them truthfully?

10:41:32	1	А	I don't think so.
10:41:33	2	Q	You don't think so?
10:41:33	3	А	Uh-huh.
10:41:35	4	Q	Have you taken any cannabis today?
10:41:36	5	А	No. I don't smoke weed.
10:41:39	6	Q	Okay. Any alcohol?
10:41:39	7	А	No.
10:41:40	8	Q	Any other substances?
10:41:41	9	А	My eye steroid.
10:41:44	10	Q	Okay. And what's wrong with your eye?
10:41:47	11	А	That, I didn't know.
10:41:48	12	Q	Okay. Any other medications you've taken this
10:41:51	13	morning o	r in the last 12 hours?
10:41:55	14	А	Asthma inhaler.
10:41:56	15	Q	Okay. I'll be referring to the Plaintiff
10:42:00	16	Megan Pet	e by different names Megan Thee Stallion,
10:42:03	17	Ms. Pete,	or just Megan.
10:42:04	18		You will understand I'm talking about the same
10:42:06	19	person; c	orrect?
10:42:07	20	А	Sure.
10:42:07	21	Q	I'll be referring to the Defendant
10:42:09	22	Milagro C	ooper as Milagro Gramz, Ms. Cooper, or Milagro.
10:42:13	23		You'll understand that I am talking about the
10:42:14	24	same pers	on; correct?
10:42:15	25	А	Sure.

10:42:16	1	Q	I'll be referring to Daystar Peterson as
10:42:19	2	Tory Lanez	or just Tory.
10:42:21	3		You'll understand I am talking about the same
10:42:22	4	person; co	rrect?
10:42:23	5	А	Sure.
10:42:23	6	Q	I'll be referring to Sonstar Peterson as
10:42:25	7	Mr. Peters	on or just Sonstar.
10:42:27	8		You'll understand I'm talking about Tory's
10:42:29	9	father; co	rrect?
10:42:29	10	A	Tory's father?
10:42:30	11	Q	Correct.
10:42:31	12	A	Sure.
10:42:32	13	Q	You are familiar with what happened between
10:42:34	14	Megan and	Tory on July 12th, 2020; correct?
10:42:39	15	Α	No.
10:42:40	16	Q .	Are you aware that Tory shot Megan in
10:42:44	17	July 2020?	
10:42:45	18	J	MR. HAYDEN: Objection. Speculation.
10:42:51	19	BY MS. HAY	RAPETIAN:
10:42:51	20	Q	You know Troy was convicted of shooting of
10:42:53	21	Megan with	a gun; correct?
10:42:54	22	A	I don't think that's what it said but sure.
10:42:56	23	Q	Okay. When I refer to the shooting or the
10:42:59	24	July 2020	incident, you'll know I'm talking about the
10:43:03	25	shooting w	e just discussed; correct?

10:43:06	1	A Sure.
10:43:06	2	Q And Unite the People and UTP mean the same
10:43:09	3	organization; correct?
10:43:11	4	A It depends on who you ask.
10:43:15	5	Q Well, I'm asking you.
10:43:17	6	A I like that. That was good. Sure.
10:43:21	7	Q Okay. Great. Did you meet Mr. Hayden
10:43:25	8	did you meet with Mr. Hayden to prepare for this
10:43:28	9	deposition?
10:43:29	10	A I don't remember.
10:43:31	11	Q Okay. Did you meet with any other attorneys
10:43:35	12	to prepare for this deposition?
10:43:37	13	A No.
10:43:38	14	Q Did you meet with anyone else at UTP to
10:43:40	15	prepare for this deposition?
10:43:42	16	A No.
10:43:44	17	Q Did you look at any documents with
10:43:48	18	Mr. Hayden to prepare for this deposition?
10:43:51	19	A I don't remember.
10:43:53	20	Q Did you meet with any of Ms. Cooper's current
10:43:57	21	attorneys?
10:43:58	22	A No.
10:43:58	23	Q Did you have a chance to talk to Ms. Cooper's
10:44:03	24	attorney, Ms. Ronda Dixon, this morning?
10:44:07	25	A No.

10:44:08	1	Q Okay. How did you prepare for today?
10:44:14	2	A I didn't. I just got up and came here.
10:44:16	3	Q You are the co-founder and CEO of UTP;
10:44:19	4	correct?
10:44:20	5	A Unite the People.
10:44:21	6	Q And is it fine if we call them "UTP" for
10:44:23	7	short?
10:44:24	8	A Sure.
10:44:26	9	Q So are you the co-founder?
10:44:27	10	A Of Unite the People? Yes.
10:44:29	11	Q And you are the CEO?
10:44:30	12	A Yes, ma'am.
10:44:31	13	Q Okay.
10:44:33	14	MS. HAYRAPETIAN: Marking as Exhibit 77, can I
10:44:38	15	have Tab 2, please?
10:44:41	16	THE COURT REPORTER: 76.
10:44:46	17	MS. HAYRAPETIAN: 76.
10:44:51	18	THE WITNESS: Did we announce who all the
10:44:52	19	people are on Zoom?
10:44:54	20	MS. HAYRAPETIAN: Yes. We've already
10:44:54	21	announced that.
10:44:55	22	THE WITNESS: We did? Who is that Los Angeles
10:44:58	23	VC Mobile? What is that?
10:44:59	24	MS. HAYRAPETIAN: That's this office.
10:45:01	25	THE WITNESS: Oh, okay.

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10:45:17	1		STENO TECH: Exhibit 77?
10:45:21	2		MS. HAYRAPETIAN: Exhibit 76.
10:45:21	3		STENO TECH: 76.
10:45:21	4		(Exhibit 76 was marked for identification.)
10:45:22	5	BY MS. HA	YRAPETIAN:
10:45:22	6	Q	Is this your bio on the website of UTP?
10:45:46	7	А	Yeah. It looks like it.
10:45:48	8	Q	Did you write this bio?
10:45:49	9	А	No.
10:45:49	10	Q	Who wrote it for you?
10:45:51	11	А	I don't remember.
10:45:51	12	Q	You co-founded UTP with Mitchell McDowell?
10:45:59	13	А	Unite the People, yeah.
10:46:00	14	Q	And Mitchell McDowell is your brother;
10:46:03	15	correct?	
10:46:04	16	А	We haven't taken a DNA test, but that's what
10:46:07	17	they say.	
10:46:09	18	Q	Mitchell currently serves as the president of
10:46:11	19	UTP?	
10:46:13	20	А	You'd have to ask him.
10:46:14	21	Q	As CEO, you don't know who the president of
10:46:17	22	UTP is?	
10:46:18	23	А	I don't remember.
10:46:20	24	Q	Are there any other co-founders of UTP?
10:46:24	25	А	No.

10:46:25	1	Q	What is the primary mission of UTP?
10:46:32	2	А	Why? Why are why are you asking me what
10:46:35	3	the mission	on is of UTP?
10:46:38	4	Q	We are taking your deposition, you are the CEO
10:46:41	5	of an orga	anization, and I would like to learn more about
10:46:43	6	the organi	zation.
10:46:46	7		MR. HAYDEN: Objection. Calls for a
10:46:47	8	narrative.	
10:46:54	9	BY MS. HAY	RAPETIAN:
10:46:54	10	Q	Do you want the question repeated?
10:46:56	11	А	What question?
10:46:58	12	Q	My pending question.
10:46:59	13	А	What is your pending question?
10:47:00	14	Q	What is the primary mission of UTP?
10:47:02	15	А	We have a lot of them.
10:47:03	16	Q	Okay. Can you name the top two.
10:47:06	17	А	Yeah. Top two? I would say helping the kids
10:47:12	18	and helpir	ng the homeless.
10:47:13	19	Q	And how do you help the kids?
10:47:16	20	А	It's a lot of ways mentoring programs,
10:47:19	21	things lik	te that.
10:47:19	22	Q	And how do you help the homeless?
10:47:22	23	А	It's cold outside. Blankets.
10:47:25	24	Q	Anything else Unite the People does?
10:47:27	25	А	Yeah. A lot of stuff.

10:47:29	1	Q W	hat else?
10:47:30	2	A S	ober living. We do sober living homes for
10:47:36	3	people.	
10:47:37	4	Q A	nd you guys also do legal work?
10:47:41	5	A Y	eah. We do some of that too.
10:47:43	6	Q O	kay. What kind of legal work?
10:47:45	7	A W	e do a lot.
10:47:47	8	Q W	hat kind of clients do you take on?
10:47:49	9	A T	he ones that call us.
10:47:51	10	Q A	nd what kind of clients call you?
10:47:55	11	A B	lack people, White people, Hispanic people,
10:47:58	12	Asian peopl	e people that need help.
10:48:00	13	Q A	nd what type of cases do they call you for?
10:48:06	14	A A	lot of different things they call for.
10:48:08	15	Doesn't mea	n we do them, but they call for a lot of
10:48:10	16	them.	
10:48:11	17	Q O	kay. So would you classify that as criminal
10:48:14	18	cases?	
10:48:15	19	A S	ure. We do those too.
10:48:17	20	Q D	o you do civil cases?
10:48:20	21	A I	think so.
10:48:23	22	Q H	ow did you obtain the financial resources
10:48:26	23	necessary t	o establish Unite the People?
10:48:28	24	A I	don't remember.
10:48:30	25	Q D	id you contribute your own finances to

10:48:32	1	setting u	up UTP?
10:48:34	2	A	I don't remember.
10:48:35	3	Q	Did your brother Mitchell contribute any
10:48:37	4	funds?	
10:48:37	5	A	I don't remember.
10:48:38	6	Q	Who else contributed funds?
10:48:40	7	A	I don't remember.
10:48:41	8	Q	Did you take out any loans?
10:48:43	9	A	I don't remember.
10:48:44	10	Q	Did you receive any donations?
10:48:45	11	A	I don't remember.
10:48:46	12	Q	Does UTP have a physical office?
10:48:51	13	A	Yes.
10:48:52	14	Q	Where is that?
10:48:54	15	A	In Long Beach.
10:48:55	16	Q	Okay. How long has UTP had a physical office?
10:49:00	17	A	I don't remember.
10:49:01	18	Q	When did you establish UTP?
10:49:11	19	A	2016.
10:49:12	20	Q	Did UTP have any employees when it first
10:49:15	21	began?	
10:49:16	22	A	I don't remember.
10:49:17	23	Q	How many employees did you have back then when
10:49:19	24	it starte	ed?
10:49:21	25	А	I just said, "I don't remember"; so how would

10:49:23	1	I know ho	w many employees?
10:49:24	2	Q	Was it just you and your brother?
10:49:26	3	A	I don't remember.
10:49:27	4	Q	Okay. How many employees do you have now?
10:49:31	5	A	A few.
10:49:32	6	Q	How many?
10:49:34	7	A	Maybe, like, 15, 20.
10:49:37	8	Q	Okay. And in what kind of roles are those 15,
10:49:40	9	20?	
10:49:46	10	A	Administrative.
10:49:48	11	Q	Administrative. Okay.
10:49:49	12		And do you have lawyers currently, aside from
10:49:52	13	Mr. Hayde	en?
10:49:53	14	A	Yes.
10:49:54	15	Q	Who?
10:49:54	16	A	I don't remember.
10:49:55	17	Q	Okay. Would you say you have two lawyers
10:49:59	18	working a	t UTP?
10:50:01	19	A	Probably so.
10:50:02	20	Q	Okay. Maybe three?
10:50:05	21	A	I don't think so.
10:50:06	22	Q	How many paralegals do you have there?
10:50:09	23	A	I don't remember.
10:50:10	24	Q	How many legal assistants?
10:50:13	25	A	I don't remember.
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10:50:14	1	Q	Okay. Do you have a best estimate?
10:50:17	2	А	15.
10:50:18	3	Q	15 legal assistants?
10:50:21	4	А	No. I thought we were talking about people.
10:50:23	5	Q	I'm just asking about legal assistants,
10:50:25	6	support s	taff.
10:50:27	7	А	Probably about 10.
10:50:28	8	Q	10 legal assistants?
10:50:30	9	А	Probably so.
10:50:31	10	Q	Okay.
10:50:31	11	А	Support staff.
10:50:32	12	Q	Support staff.
10:50:33	13	А	Sure.
10:50:34	14	Q	Did UTP recruit lawyers from 2016 forward, or
10:50:41	15	did that	start later?
10:50:43	16	А	I don't remember.
10:50:46	17	Q	Do you recall what the first case UTP took on
10:50:48	18	was?	
10:50:49	19	А	No.
10:50:51	20	Q	Do you recall how long ago it was?
10:50:53	21	А	No.
10:50:53	22	Q	How did you become the CEO of UTP?
10:51:00	23	А	By working hard.
10:51:02	24	Q	Okay. Why did you take the title of CEO?
10:51:07	25	А	I don't remember.

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CEASAR MCDOWELL JULY 25, 2025

10:51:08	1	Q	What are your responsibilities as CEO of UTP?
10:51:11	2	А	I don't remember.
10:51:12	3	Q	You don't know your daily responsibilities?
10:51:13	4	A	No. I have a lot of them.
10:51:15	5	Q	Okay. Can you name one?
10:51:17	6	A	Work hard.
10:51:21	7	Q	Okay. And so what do you do on a day-to-day?
10:51:24	8	А	Work hard.
10:51:27	9	Q	And how do you work hard?
10:51:28	10	A	I put mattresses upstairs. I lift bunk beds,
10:51:32	11	dressers.	I clean out carports. I feed the homeless.
10:51:37	12	I do a lo	t.
10:51:39	13	Q	Okay. And this is all work for UTP?
10:51:41	14	A	Every day.
10:51:42	15	Q	As CEO, are you responsible for determining
10:51:47	16	the overa	ll vision and objectives of UTP?
10:51:52	17	А	Maybe.
10:51:55	18	Q	Maybe?
10:51:55	19	A	Yeah.
10:51:56	20	Q	What does that mean?
10:51:57	21	А	Well, I'm not a dictator.
10:51:59	22	Q	Okay.
10:52:00	23	А	Yeah.
10:52:00	24	Q	So how do you manage?
10:52:06	25	А	How do I manage what?

10:52:07	1	Q	Your staff?
10:52:11	2	А	What do you mean by that? Can you explain?
10:52:13	3	Q	You are a CEO; right?
10:52:14	4	А	Sure.
10:52:14	5	Q	You lead the company?
10:52:16	6	А	Okay.
10:52:16	7	Q	How do you lead the company?
10:52:19	8	А	By working hard.
10:52:20	9	Q	Who at UTP do you have authority over as CEO?
10:52:29	10	А	Everybody there.
10:52:30	11	Q	Okay. So everyone
10:52:32	12	А	That was a good answer. I answered just what
10:52:33	13	you wante	d; huh? Everybody there.
10:52:35	14	Q	Yeah. Exactly.
10:52:37	15	А	Sure.
10:52:38	16	Q	Are there any people in particular that are
10:52:40	17	your dire	ct reports?
10:52:42	18	А	Are my direct reports?
10:52:44	19	Q	Yes.
10:52:45	20	А	I don't remember.
10:52:46	21	Q	Does Mr. Hayden report to you?
10:52:51	22	А	Yes.
10:52:52	23	Q	As CEO, do you make the ultimate decisions
10:52:54	24	about whi	ch cases UTP takes on?
10:52:57	25	А	No. The lawyers do.

10:52:58	1	Q	Okay. Do you decide which clients UTP will
10:53:01	2	represent	.?
10:53:03	3	А	I'm not a lawyer.
10:53:07	4	Q	Do you are you involved in the
10:53:08	5	decision-	making of the types of cases UTP should take
10:53:11	6	on?	
10:53:12	7	А	The types of cases? Yes.
10:53:14	8	Q	Okay. And what types of cases are those?
10:53:17	9	A	Where the people need us, and we can help.
10:53:19	10	Q	Okay.
10:53:20	11	A	Those are the ones we take.
10:53:22	12	Q	What's the most recent case you've taken on?
10:53:24	13	A	I don't know. I don't know.
10:53:25	14	Q	What's the favorite case you've taken on?
10:53:27	15	А	Tory Lanez.
10:53:29	16	Q	Okay. And which one which one of his cases
10:53:31	17	are we ta	lking about?
10:53:33	18	A	I don't know what you are talking about
10:53:33	19	which one	es. He has multiple cases.
10:53:38	20	Q	You tell me.
10:53:39	21	A	Oh. I don't know.
10:53:40	22	Q	Which one of his which case of his are you
10:53:42	23	talking a	bout that's your favorite?
10:53:45	24	А	Well, maybe his case isn't my favorite.
10:53:47	25	Allan McI	ntosh case is my favorite.

10:53:51	1	Q Okay. And what's that case about?
10:53:52	2	A A guy that was basically Black while driving
10:53:56	3	and given 25 to life, plus five years, and we got him
10:54:00	4	free from prison. That's my favorite case.
10:54:03	5	Q Okay. And why was it your favorite case?
10:54:05	6	A 'Cause he is a good guy.
10:54:07	7	Q Okay. And how did you meet him?
10:54:09	8	A In prison.
10:54:12	9	Q And where were you in prison?
10:54:14	10	A Everywhere.
10:54:16	11	Q Because you were transferred?
10:54:18	12	A Yeah.
10:54:19	13	Q How many times were you transferred?
10:54:20	14	A Twenty.
10:54:22	15	Q How come you were transferred so many times?
10:54:25	16	A 'Cause I did so many years. They transfer you
10:54:27	17	ever year, if you are good, and I was good.
10:54:30	18	Q Okay. Do you control UTP's budget and
10:54:34	19	financial decisions?
10:54:36	20	A I don't remember.
10:54:37	21	Q Okay. Do you have the authority to hire and
10:54:39	22	fire UTP employees?
10:54:42	23	A Yes.
10:54:44	24	Q Do you determine fee arrangements with
10:54:46	25	clients?

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10:54:47	1	А	No.
10:54:48	2	Q	Who determines fee arrangements with clients?
10:54:51	3	А	I would think the lawyers did it.
10:54:53	4	Q	Okay. As CEO, do you decide how UTP's
10:54:57	5	resources	are allocated between different cases?
10:55:00	6	A	Between different cases?
10:55:02	7	Q	Uh-huh.
10:55:04	8	A	I don't think so.
10:55:05	9		Between cases you are saying?
10:55:06	10	Q	Yeah.
10:55:07	11	A	No.
10:55:08	12	Q	Okay. You understand there's a difference
10:55:11	13	between ru	unning UTP's business operations and providing
10:55:14	14	legal adv	ice; correct?
10:55:15	15	A	100 percent.
10:55:18	16	Q	As CEO, you focus on business decisions
10:55:23	17	rather	rather than legal strategy; correct?
10:55:25	18	A	I don't know.
10:55:26	19	Q	You don't provide legal advice to UTP's
10:55:29	20	clients; d	correct?
10:55:30	21	А	That's against the law.
10:55:32	22	Q	You don't have a law license; correct?
10:55:38	23	A	I don't remember.
10:55:39	24	Q	You never attended law school; correct?
10:55:42	25	А	Prison.

10:55:44	1	Q	They had law school in prison?
10:55:45	2	А	No. They had prison in prison.
10:55:47	3	Q	Okay. So you didn't attend law school?
10:55:48	4	A	I went to prison.
10:55:50	5	Q	You are not a lawyer?
10:55:52	6	A	No.
10:55:52	7	Q	You are not a paralegal?
10:55:54	8	A	Well, you don't know. I could be a paralegal.
10:55:58	9	You don't	have to have a license to be a paralegal.
10:56:00	10	Q	Okay. And that's according to which state's
10:56:02	11	law?	
10:56:02	12	A	I don't know. You look it up. You are the
10:56:04	13	lawyer.	
10:56:05	14	Q	Are you saying you are a paralegal?
10:56:07	15	A	No. I didn't say that. I said I didn't say I
10:56:10	16	wasn't.	
10:56:11	17	Q	Okay. Are you a paralegal? Yes or no?
10:56:15	18	A	Maybe.
10:56:16	19	Q	Maybe?
10:56:17	20	A	Yeah.
10:56:17	21	Q	Okay. Have you gone to paralegal school?
10:56:21	22	A	In prison.
10:56:22	23	Q	You went you attended paralegal school in
10:56:24	24	prison?	
10:56:25	25	A	Yeah, they have paralegal school in prison.

10:56:27	1	Q	Did you obtain a certificate?
10:56:29	2	A	Actually, I have a few of them.
10:56:30	3	Q	Okay. What how many paralegal certificates
10:56:33	4	do you ha	ve?
10:56:33	5	A	I think three.
10:56:34	6	Q	Okay. And are you able to produce those?
10:56:38	7	A	I didn't bring them with me.
10:56:40	8	Q	Okay. But you have them, and they're
10:56:41	9	accessibl	e?
10:56:43	10	A	They could be. They're from 20 years ago. It
10:56:44	11	was a lon	g time in prison.
10:56:46	12	Q	Okay. So you've been a paralegal for
10:56:48	13	20 years?	
10:56:49	14	A	I didn't say that.
10:56:50	15	Q	You've had paralegal certificates from prison
10:56:52	16	for 20 ye	ears?
10:56:53	17	A	Just about.
10:56:54	18	Q	Okay. Do you consider yourself a legal
10:56:58	19	assistant	?
10:56:59	20	A	Not at all.
10:57:00	21	Q	Do you have legal training?
10:57:02	22	A	We just talked about that.
10:57:04	23	Q	Do you consider that legal training?
10:57:05	24	A	I would think so, yes.
10:57:07	25	Q	Okay. You don't translate languages; correct?
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10:57:11	1	A Swahili. I do. I speak fluent Swahili.
10:57:18	2	Q Okay. Do you interpret legal documents in
10:57:21	3	Swahili for UTP clients?
10:57:24	4	A No.
10:57:25	5	Q You are not a consultant; right?
10:57:30	6	A I could be. I could be a consultant; right?
10:57:33	7	Q What kind of consultant are you?
10:57:35	8	A I just said, "I could be."
10:57:36	9	Q You are not a private investigator; right?
10:57:39	10	A No.
10:57:40	11	Q As CEO, do you give instructions to UTP's
10:57:43	12	lawyers?
10:57:44	13	A Do I give instructions to UTP lawyers, you
10:57:48	14	said?
10:57:49	15	Q Yeah.
10:57:49	16	A About what?
10:57:50	17	Q About which cases to take on?
10:57:53	18	A We already talked about that. I already told
10:57:56	19	you the lawyers decide that.
10:57:57	20	Q Lawyers decide.
10:57:58	21	You give no instructions on what types of
10:57:59	22	cases they should take?
10:58:01	23	A Nope.
10:58:01	24	Q Okay. You don't suggest or bring forward the
10:58:05	25	types of cases you'd like them to pursue?
10:58:01 10:58:01	23 24	A Nope.  Q Okay. You don't suggest or bring forward the

10:58:09	1	A Do I suggest? Boy, you are being slick with
10:58:11	2	that. I don't remember.
10:58:14	3	Q Okay. Do you help them with legal strategy?
10:58:20	4	A Do I help the lawyers?
10:58:23	5	Q Uh-huh.
10:58:23	6	A They went to law school. They know the
10:58:25	7	strategies, not me.
10:58:26	8	Q So you don't help them with legal strategy?
10:58:28	9	A I wouldn't think so.
10:58:30	10	Q You don't advise them on how to handle
10:58:35	11	specific client matters?
10:58:37	12	A Advise them on how to handle oh, Lord.
10:58:41	13	What time is this over?
10:58:43	14	Q I get to have seven hours on the record.
10:58:46	15	A Do you?
10:58:46	16	Q I do.
10:58:47	17	A All right. So but I get to have all the
10:58:50	18	breaks I want; right? I get something here.
10:58:53	19	Am I under arrest?
10:58:54	20	Q We just took a break.
10:58:55	21	A Okay. When did you take a break?
10:58:57	22	You took a break, not me. You left. I was
10:58:59	23	here at the table.
10:59:00	24	Q Do you need a break?
10:59:02	25	A Not now.

10:59:03	1	Q Okay. Great.
10:59:04	2	So do you assist the lawyers?
10:59:08	3	A No.
10:59:09	4	Q You don't assist the lawyers?
10:59:11	5	A Assist the lawyers with what?
10:59:12	6	Q How to handle specific client matters?
10:59:14	7	A I'm not a lawyer.
10:59:16	8	Q Okay. So you don't consult with them on
10:59:17	9	strategy?
10:59:18	10	A No. Those are lawyer jobs.
10:59:20	11	Q Okay. And do you provide input on whether
10:59:23	12	they should withdraw from representation from certain
10:59:26	13	matters?
10:59:28	14	A Do I provide information? I don't remember.
10:59:31	15	Q Have you ever told the lawyers to withdraw
10:59:33	16	from a specific case?
10:59:34	17	A I don't remember.
10:59:37	18	Q Have you ever told the lawyers to take on a
10:59:39	19	specific case?
10:59:40	20	A I don't remember.
10:59:43	21	Q As CEO, do you communicate directly with UTP
10:59:46	22	clients?
10:59:46	23	A Do I communicate? I don't remember.
10:59:48	24	Q Do you need permission from UTP's lawyers
10:59:51	25	before speaking with clients?

10:59:52	1	A I don't remember.	
10:59:53	2	Q Are there any restrictions on what you can	
10:59:55	3	discuss with clients?	
11:00:01	4	A I don't remember.	
11:00:01	5	Q Do UTP lawyers supervise your communications	
11:00:04	6	with clients?	
11:00:04	7	A I said I don't remember if I communicate just	
11:00:07	8	two minutes ago.	
11:00:08	9	Q Okay. So	
11:00:09	10	A I don't remember.	
11:00:09	11	Q you don't remember?	
11:00:10	12	A No.	
11:00:11	13	Q When there's a disagreement between you and	
11:00:14	14	UTP's lawyers about a case, who makes the final	
11:00:17	15	decision?	
11:00:19	16	A We just said, two minutes ago, that they make	
11:00:22	17	the decisions about the cases.	
11:00:25	18	Q But, when there's a disagreement between how a	
11:00:28	19	case should be handled, who makes the final decision?	
11:00:33	20	A I don't remember.	
11:00:34	21	Q If you wanted UTP to take on a particular	
11:00:37	22	client, could the lawyers refuse?	
11:00:40	23	A Always.	
11:00:41	24	Q If you wanted UTP to drop a client, could you	
11:00:45	25	make that decision as CEO?	

11:00:47	1	A No.
11:00:47	2	Q Your job is to run UTP's business operations;
11:00:51	3	correct?
11:00:52	4	A Absolutely.
11:00:53	5	Q UTP's lawyers can represent clients without
11:00:55	6	your involvement; correct?
11:00:57	7	A UTP's lawyers can represent? Sure.
11:01:01	8	Q You get involved because you are the CEO, not
11:01:03	9	because the lawyers need you; correct?
11:01:07	10	A Lawyers need me?
11:01:09	11	Q Do they need you, or they operate
11:01:11	12	independently?
11:01:11	13	A Do you need the CEO at your company? It's a
11:01:16	14	fair question.
11:01:17	15	Q Actually, I don't even know if my company has
11:01:20	16	a CEO; so
11:01:22	17	A That's fine. I don't remember.
11:01:24	18	Q Okay. So the lawyers just to get a
11:01:30	19	clarification on my question.
11:01:32	20	A Sure.
11:01:33	21	Q The lawyers don't need you to operate their
11:01:38	22	cases; correct?
11:01:40	23	A No.
11:01:41	24	Q UTP has several social media accounts; right?
11:01:54	25	A I don't remember how many accounts they have.

11:01:55	1	Q Do you have one?
11:01:57	2	A Yeah.
11:01:58	3	Q UTP has at least one social media account?
11:02:01	4	A Yes.
11:02:01	5	Q On which platform?
11:02:02	6	A I don't know which one.
11:02:03	7	Q Instagram?
11:02:04	8	A I don't know which one.
11:02:05	9	Q Twitter?
11:02:07	10	A Let's keep going. I don't know which one.
11:02:09	11	Q Okay. You have your phone; right?
11:02:10	12	A No. I put it over there 'cause you asked me
11:02:13	13	to.
11:02:14	14	Q Okay. Can you check to see?
11:02:15	15	A No.
11:02:16	16	Q Okay. Do you personally manage UTP's social
11:02:18	17	media accounts?
11:02:21	18	A No.
11:02:21	19	Q So, if we were to log open your Instagram
11:02:27	20	account, the UTP Instagram account would not be logged
11:02:31	21	into your Instagram app?
11:02:33	22	A It might be.
11:02:34	23	Q It might be. Okay.
11:02:36	24	So you are involved in drafting social media
11:02:38	25	posts on UTP accounts; correct?

11:02:43	1	А	I don't remember.
11:02:49	2	Q	You have your own social media accounts?
11:02:50	3	А	Yes.
11:02:51	4	Q	So, when you are posting to your own social
11:02:52	5	media acc	ounts, do you also share to post on UTP's?
11:02:57	6	А	I don't remember none of that.
11:02:58	7	Q	Okay. Do you have final say over what is
11:03:01	8	posted on	UTP's social media accounts?
11:03:03	9	А	I don't know who has final say.
11:03:06	10	Q	Do you know who runs the social media
11:03:07	11	accounts?	
11:03:10	12	А	I don't remember.
11:03:11	13	Q	Do you have a social media marketing manager?
11:03:15	14	А	Sometimes.
11:03:16	15	Q	Sometimes. Okay.
11:03:18	16		Can you tell me one of your most recent social
11:03:21	17	media man	agers?
11:03:23	18	А	I've had a few.
11:03:24	19	Q	Okay. Give me one name.
11:03:25	20	А	Jesse.
11:03:27	21	Q	Desi.
11:03:27	22		What's her last name?
11:03:28	23	А	I said, "Jesse."
11:03:29	24	Q	Jesse.
11:03:30	25		What's her last name?

11:03:31	1	A Jackson.
11:03:31	2	Q Okay. And anyone else?
11:03:33	3	A There was Jayboo.
11:03:35	4	Q Last name?
11:03:36	5	A Differentdaddy.
11:03:39	6	(The Court Reporter requested clarification.)
11:03:39	7	THE WITNESS: Differentdaddy.
11:03:39	8	Jayboo Differentdaddy.
11:03:40	9	BY MS. HAYRAPETIAN:
11:03:41	10	Q Differentdaddy is the last name?
11:03:42	11	A Uh-huh.
11:03:44	12	Q Anyone else?
11:03:47	13	A I can go on. There's tons of people.
11:03:50	14	Q Okay. Everyone runs the social media account?
11:03:54	15	A Yeah, pretty much. Yeah.
11:03:55	16	Q Okay. But you also have the password, and you
11:03:57	17	can post to it?
11:03:58	18	A I don't have the password.
11:04:00	19	Q But it's logged in to your Instagram?
11:04:03	20	A I don't know.
11:04:03	21	Q Okay. You don't know one way or the other, as
11:04:08	22	in it can be logged in, if we were to check your
11:04:11	23	Instagram app right now?
11:04:12	24	A You can't check my Instagram app.
11:04:15	25	Q If we were, hypothetically speaking, it could

11:04:16	1	be logged in?
11:04:17	2	A Hypothetically speaking, I don't know.
11:04:19	3	Q Does everyone working at UTP have access to
11:04:24	4	the social media accounts?
11:04:27	5	A I don't know.
11:04:30	6	Q Have you ever sought Tory's feedback or
11:04:32	7	approval on social media posts made on UTP's accounts?
11:04:35	8	A Who?
11:04:35	9	Q Tory.
11:04:36	10	A Tory who?
11:04:36	11	Q Tory Lanez.
11:04:37	12	A Tory Lanez?
11:04:39	13	Q Any time of say "Tory," I'm talking about
11:04:42	14	Tory Lanez.
11:04:43	15	A Oh, okay. Okay.
11:04:46	16	Q Do you have an answer to my question?
11:04:48	17	A What was the question?
11:04:49	18	Q The question was, have you ever sought Tory's
11:04:51	19	feedback or approval on any social media post on UTP's
11:04:54	20	account?
11:04:54	21	A I don't remember.
11:04:55	22	Q You don't remember?
11:04:56	23	A No.
11:04:56	24	Q Okay. Do you remember ever talking to Tory
11:04:59	25	about UTP's social media accounts?

11:05:02	1	А	I don't remember talking to him, no.
11:05:03	2	Q	You send and respond to direct message on
11:05:06	3	UTP's soc	ial media accounts; correct?
11:05:08	4	А	I don't remember.
11:05:09	5	Q	Have you ever exchanged any messages with
11:05:11	6	others ab	out Ms. Cooper?
11:05:14	7	А	I don't remember.
11:05:15	8	Q	Do you have any direct messages with others
11:05:16	9	about Ms.	Pete on UTP's accounts?
11:05:19	10	А	I don't remember.
11:05:20	11	Q	You've received alleged tips concerning the
11:05:22	12	subject matter of this action on UTP's social media	
11:05:25	13	accounts;	correct?
11:05:26	14	A	I don't remember.
11:05:27	15	Q	Have you ever communicated with Ms. Cooper,
11:05:30	16	using any	of UTP's social media accounts?
11:05:32	17	А	I don't remember.
11:05:33	18	Q	Have you ever communicated with Tory, using
11:05:35	19	any of UT	P's social media accounts?
11:05:37	20	А	I do not remember.
11:05:38	21	Q	Have you ever communicated with Tory's father,
11:05:40	22	using any	of UTP's social media accounts?
11:05:44	23	А	I do not remember.
11:05:45			
	24	Q	Okay. Let's talk a little bit about your

11:05:49	1	According to your bio, you served a 20-year
11:05:53	2	sentence at San Quentin prison; is that correct?
11:05:56	3	A No. It was San Quentin, and it was only
11:05:59	4	10 years that I was there.
11:06:01	5	Q Okay. So how come your bio says 20 years?
11:06:05	6	A 'Cause whoever wrote it didn't realize I was
11:06:08	7	transferred every year.
11:06:09	8	Q Okay. Cumulatively or collectively, how many
11:06:13	9	years have you served in prison?
11:06:15	10	A Twenty-six?
11:06:19	11	Q Twenty-six.
11:06:20	12	Was that for one conviction?
11:06:24	13	A No.
11:06:25	14	Q Different convictions?
11:06:26	15	A Yeah.
11:06:26	16	Q How many years were you in prison?
11:06:28	17	A Twenty-six.
11:06:30	18	Q Sorry. What years were you in prison?
11:06:33	19	A 1992. 1992.
11:06:41	20	Q 1992 to?
11:06:42	21	A To '97. And 2000 to 2020.
11:06:49	22	Q What were you in prison for
11:06:51	23	A I don't remember.
11:06:52	24	Q from 1992 to 1997?
11:06:54	25	A I don't remember.

11:06:55	1	Q	You don't recall?
11:06:56	2	A	Huh-uh.
11:06:57	3	Q	Okay. And then from 2000 to 2020, what were
11:07:00	4	you in pr	rison for?
11:07:02	5	A	I don't remember. I think it was being Black.
11:07:05	6	Q	Being Black. Okay.
11:07:17	7	A	Can I have some water?
11:07:22	8	Q	Sure.
11:07:26	9	A	Thank you, brother.
11:07:32	10	Q	What crimes were you convicted for, for the
11:07:34	11	last 20 y	rears that you served in prison?
11:07:36	12	A	I don't remember.
11:07:39	13	Q	Do you remember what happened that caused you
11:07:41	14	to go to	prison? What was the event?
11:07:44	15	A	I don't remember.
11:07:45	16	Q	Are you currently on probation?
11:07:49	17	A	Not at all.
11:07:53	18	Q	Is UTP a for-profit law firm?
11:07:57	19	A	No.
11:07:58	20	Q	Do you consider UTP to be a law firm?
11:08:01	21	A	Yes.
11:08:02	22	Q	Okay. Has UTP filed articles of incorporation
11:08:06	23	with the	California Secretary of State?
11:08:08	24	A	Yes.
11:08:10	25	Q	What years?

11:08:12	1	А	2016.
11:08:14	2	Q	And every year since then?
11:08:16	3	А	I don't know.
11:08:16	4	Q	Is UTP a legal aid organization?
11:08:23	5	А	We legally aid people; so you can call it what
11:08:26	6	you want.	
11:08:26	7	Q	Does UTP receive public or governmental grants
11:08:29	8	to suppor	t its operations?
11:08:31	9	А	Not at all.
11:08:32	10	Q	Not at all, or you don't know?
11:08:34	11	А	I don't know.
11:08:37	12	Q	Do you represent clients for free?
11:08:43	13	А	Yes.
11:08:44	14	Q	Okay. You never take money for representing
11:08:48	15	clients?	
11:08:48	16	А	Oh, yes.
11:08:49	17	Q	Okay. And what prices do you charge?
11:08:54	18	А	I don't know what to tell you. You'd have to
11:08:56	19	ask them.	
11:08:56	20	Q	Who is "them"?
11:08:57	21	А	The other people besides me.
11:08:59	22	Q	Who are the other people?
11:09:00	23	А	The 15 to 20 staff people.
11:09:01	24	Q	Okay. So who decides how much a case a
11:09:05	25	case or r	epresentation in a case costs?

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11:09:07	1	A I don't know.
11:09:09	2	Q As CEO of the company, you do not know how
11:09:11	3	much you guys charge for
11:09:13	4	A I think it differs. Being a non-profit, it
11:09:16	5	probably differs.
11:09:16	6	Q Okay. What does that mean?
11:09:18	7	A It probably a sliding scale.
11:09:21	8	Q Okay. So what's at the lower end of the
11:09:23	9	sliding scale?
11:09:24	10	A Free.
11:09:25	11	Q Free. Okay.
11:09:26	12	What's at the higher end of the sliding scale?
11:09:28	13	A That, I don't know.
11:09:29	14	Q Do you have a fixed rate?
11:09:30	15	A I don't think they do. There's different
11:09:32	16	things.
11:09:32	17	Q Hourly rate?
11:09:34	18	A Do you understand post-conviction?
11:09:35	19	Q Yes.
11:09:36	20	A You do?
11:09:36	21	Q Yes.
11:09:37	22	A Okay. Is there a difference between the writ
11:09:39	23	and a writ of habeas corpus and a direct appeal?
11:09:43	24	Q I don't know. I don't run a law firm.
11:09:45	25	A You just said you understood.

11:09:46	1	Q I don't run a law firm.	
11:09:47	2	A Okay. I don't know either.	
11:09:49	3	Q Okay. What percentage of your clients are	
11:09:53	4	considered indigent?	
11:09:55	5	A I don't know.	
11:09:56	6	Q Is UTP registered with The State Bar of	
11:09:57	7	California?	
11:09:58	8	A Yes.	
11:10:00	9	Q When did UTP first register with The State Bar	
11:10:02	10	of California?	
11:10:04	11	A Probably in 2017.	
11:10:10	12	Q What is your involvement in UTP's legal	
11:10:11	13	matters?	
11:10:15	14	A I don't know.	
11:10:17	15	Q While supporting UTP's legal matters, have you	
11:10:19	16	ever been under the influence of any impairing drugs or	
11:10:22	17	substances?	
11:10:24	18	A Why? What? Say that again, please. I don't	
11:10:27	19	understand your question.	
11:10:28	20	Q Sure. While supporting UTP's legal matters	
11:10:30	21	A While supporting UTP's legal matters?	
11:10:32	22	Q Uh-huh.	
11:10:36	23	MS. DIXON: Objection. Relevance.	
11:10:37	24	BY MS. HAYRAPETIAN:	
11:10:37	25	Q have you ever been under the influence of	

	1		
11:10:39	1	any drugs	or substances?
11:10:40	2	А	When?
11:10:41	3	Q	At any time when you were helping UTP?
11:10:45	4		MR. HAYDEN: You can answer.
11:10:46	5		THE WITNESS: I can answer?
11:10:47	6		MR. HAYDEN: Yeah.
11:10:47	7		THE WITNESS: No.
11:10:47	8	BY MS. HA	YRAPETIAN:
11:10:48	9	Q	Okay. Have you been involved in preparing
11:10:50	10	witnesses	in this case for their depositions?
11:10:53	11	А	Preparing witnesses for their depositions? I
11:10:57	12	don't 1	no.
11:10:58	13	Q	Okay. Did you communicate with Tory before
11:11:00	14	his depos	ition?
11:11:01	15	A	I don't remember.
11:11:02	16	Q	Did you help Tory prepare for his deposition?
11:11:04	17	А	I don't remember.
11:11:06	18	Q	Did you communicate with Sonstar before his
11:11:08	19	deposition	n?
11:11:08	20	A	Who.
11:11:09	21	Q	Sonstar?
11:11:09	22	A	Who is that?
11:11:10	23	Q	Tory's dad?
11:11:11	24	A	Oh. I don't remember.
11:11:13	25	Q	Did you advise Sonstar on what he should or

11:11:16	1	should not say?	
11:11:17	2	A I don't m	remember.
11:11:19	3	Q At the ti	me UTP was representing Ms. Cooper in
11:11:21	4	this action, did yo	ou meet with Ms. Cooper to prepare for
11:11:24	5	her deposition?	
11:11:25	6	A Who?	
11:11:25	7	Q Ms. Coope	er. Milagro Cooper.
11:11:28	8	A Did I mee	et with her?
11:11:29	9	Q Yes.	
11:11:31	10	A Did I mee	et with her?
11:11:33	11	Q Correct.	
11:11:34	12	A I don't e	even know her.
11:11:35	13	Q You don't	know Ms
11:11:37	14	A I've neve	er met her in person ever in life.
11:11:39	15	Q Okay. Do	O UT do UTP lawyers instruct you on
11:11:44	16	how to assist them on UTP cases?	
11:11:48	17	A We alread	y talked about that; so I'll just say
11:11:50	18	I don't remember.	
11:11:51	19	Q Do UTP la	awyers supervise your activities?
11:11:55	20	A I don't r	remember.
11:11:56	21	Q Do UTP la	awyers provide you feedback on your
11:11:58	22	assignments?	
11:11:59	23	A I don't r	remember.
11:12:00	24	Q Are you s	subject to an annual review of your
11:12:03	25	performance?	

11:12:04	1	A I don't remember.
11:12:05	2	Q Do you need to seek Mr. Hayden or another
11:12:08	3	lawyer's approval before speaking with clients?
11:12:12	4	A It's the same question three times over and
11:12:14	5	over. I don't remember.
11:12:17	6	Q Do you need to seek Mr. Hayden's or any
11:12:19	7	other lawyer's approval to speak to Tory?
11:12:24	8	A I don't remember.
11:12:27	9	Q Okay. Did you need to seek Mr. Hayden's or
11:12:30	10	another lawyer's approval to speak to Ms. Cooper?
11:12:33	11	A Who?
11:12:34	12	Q Ms. Cooper. Milagro Cooper.
11:12:36	13	A Who is that?
11:12:37	14	Q The defendant in this case Milagro Gramz.
11:12:39	15	A What is this case about?
11:12:42	16	Q Milagro Cooper is the defendant in this
11:12:44	17	action
11:12:45	18	A Uh-huh.
11:12:46	19	Q brought by Ms. Pete.
11:12:47	20	A Okay. Do you know what it's about?
11:12:52	21	Q Yes. Unfortunately, it's not my deposition
11:12:54	22	yet today.
11:12:55	23	A Well, I'm just trying to find out. Go ahead.
11:12:58	24	Q Okay. So this is a case you took on; right?
11:13:04	25	A I think so, yeah.

11:13:05	1	Q Okay. So you don't know what the case is		
11:13:06	2	about, but you took it on?		
11:13:08	3	A I don't know what it's about.		
11:13:09	4	Q Okay. You just took it on 'cause Tory told		
11:13:11	5	you to?		
11:13:12	6	A 'Cause Tory told me to? So now if you		
11:13:13	7	start		
11:13:13	8	Q Yeah.		
11:13:14	9	MR. HAYDEN: Objection. Speculation.		
11:13:15	10	THE WITNESS: if you start, I start; right?		
11:13:16	11	MR. HAYDEN: I said, "Objection.		
11:13:17	12	Speculation."		
11:13:19	13	BY MS. HAYRAPETIAN:		
11:13:20	14	Q Can you answer my question?		
11:13:22	15	A I don't know what you are talking about.		
11:13:24	16	Q Okay. Did you need to seek Mr. Hayden's or		
11:13:29	17	another lawyer's approval before speaking to Ms. Cooper?		
11:13:34	18	A I don't remember.		
11:13:35	19	Q Okay. You are aware that the State of		
11:13:36	20	California charged Tory with three felonies for shooting		
11:13:40	21	Ms. Pete on July 12th, 2020; correct?		
11:13:44	22	A For doing what? Who shot her? Is that what		
11:13:48	23	you are saying?		
11:13:49	24	Q Actually, my question was: You are aware that		
11:13:51	25	the state of California charged Tory with three felonies		

11:13:55	1	for shoot	ing Ms. Pete on July 12th, 2020?
11:13:58	2	A	I don't remember.
11:13:58	3	Q	You don't remember. Okay.
11:14:00	4	A	Huh-uh.
11:14:01	5	Q	And do you remember that Tory was convicted of
11:14:03	6	one felon	y assault with a semi-autic firearm?
11:14:07	7	A	Semi-autic?
11:14:08	8	Q	Semi-automatic. Sorry.
11:14:09	9	A	Automatic, oh. I don't remember.
11:14:11	10	Q	And do you remember if Tory was convicted of
11:14:15	11	illegal p	ossession of a firearm?
11:14:18	12	A	Was he?
11:14:20	13	Q	And Tory was convicted of negligent discharge
11:14:23	14	of a fire	earm; correct?
11:14:25	15	A	I don't know.
11:14:25	16	Q	The jury unanimously found Tory guilty of all
11:14:29	17	three fel	ony accounts; correct?
11:14:30	18	A	I don't know.
11:14:31	19	Q	Tory was
11:14:33	20	A	They unanimously found him? That's what you
11:14:36	21	are sayin	ıg?
11:14:36	22	Q	Yes.
11:14:37	23	A	Is it? Wow.
11:14:38	24	Q	You don't know?
11:14:38	25	A	I didn't know.

11:14:39	1	Q Okay. It's not a case you took on?
11:14:41	2	A I don't know his charges.
11:14:42	3	Q Okay. Tory was sentenced to 10 years in
11:14:45	4	prison as a result of his felony convictions; correct?
11:14:49	5	A I think so.
11:14:50	6	Q And Tory currently remains in prison, serving
11:14:52	7	that same sentence?
11:14:53	8	A He is still there?
11:14:59	9	Q Do you know? You don't know?
11:14:59	10	A What?
11:15:00	11	Q If Tory is still in prison?
11:15:03	12	A I don't know where he is at.
11:15:04	13	Q Okay. So he might be out of prison?
11:15:06	14	A He could be.
11:15:08	15	Q Okay.
11:15:08	16	A I've been in here with you.
11:15:10	17	Q All right.
11:15:10	18	Tory was proven guilty beyond a reasonable
11:15:13	19	doubt by a jury of his peers; correct?
11:15:16	20	A Jury of his peers?
11:15:18	21	Q Yep.
11:15:19	22	MS. DIXON: Objection. Asked and answered.
11:15:20	23	And argumentative.
11:15:24	24	THE WITNESS: What she said.
11:15:25	25	BY MS. HAYRAPETIAN:

11:15:26	1	Q	What did she say? I couldn't hear.
11:15:29	2	A	You couldn't?
11:15:29	3	Q	No.
11:15:30	4	A	Oh, okay.
11:15:34	5	Q	Do you have an answer to my question?
11:15:36	6	A	What was your question?
11:15:37	7		MS. HAYRAPETIAN: Can you read it back.
11:15:38	8		(The following record was read:
11:15:38	9		"QUESTION: All right. Tory was proven
11:15:38	10		guilty beyond a reasonable doubt by a jury
11:15:38	11		of his peers; correct?")
11:15:51	12		THE WITNESS: Were you asking me that?
11:15:52	13	BY MS. HA	AYRAPETIAN:
11:15:53	14	Q	Uh-huh.
11:15:54	15	A	A jury of his peers. That's big.
11:15:59	16	Q	Yes-or-no question.
11:16:00	17	A	What was it?
11:16:02	18	Q	Do you have an answer?
11:16:04	19	A	To was he convicted by his peers? That was
11:16:08	20	the quest	cion?
11:16:08	21	Q	Yeah, that was the question.
11:16:09	22	A	Nah. I don't think he was convicted by his
11:16:11	23	peers.	
11:16:12	24	Q	Okay. Who do you think he was convicted by?
11:16:16	25	A	Peoples.

11:16:16	1	Q	What peoples?	
11:16:17	2	A	Peoples that was in the courtroom.	
11:16:20	3	Q	Okay. You were at Tory's criminal trial;	
11:16:24	4	correct?		
11:16:25	5	А	Sometimes.	
11:16:26	6	Q	Sometimes.	
11:16:27	7		You weren't being paid to attend Tory's trial,	
11:16:28	8	were you?		
11:16:32	9	А	No.	
11:16:34	10	Q	Okay. You weren't working for any of the	
11:16:36	11	lawyers r	epresenting Tory; right?	
11:16:39	12	А	I don't know.	
11:16:40	13	Q	So you were attending the trial as his friend	
11:16:42	14	of Tory?		
11:16:43	15	А	I don't know.	
11:16:45	16	Q	You knew Tory well before his trial; correct?	
11:16:47	17	А	I don't remember.	
11:16:48	18	Q	Do you remember when you met Tory?	
11:16:51	19	А	No.	
11:16:52	20	Q	How how long have you known him?	
11:16:53	21	А	I don't know.	
11:16:53	22	Q	Best estimate?	
11:16:56	23	А	A lot of days.	
11:16:57	24	Q	Okay. So I'm entitled to your best estimate	
11:16:59	25	which is	different from a guess.	

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11:17:01	1		Do you know the difference between an estimate	
11:17:02	2	and a guess?		
11:17:03	3	A	Three days.	
11:17:04	4	Q	You've known Tory for three days?	
11:17:06	5	A	Yep. For sure. I've known him definitely for	
11:17:08	6	three day	s.	
11:17:09	7	Q	Okay. Have you known Tory for longer than	
11:17:10	8	three day	rs?	
11:17:11	9	A	Yes.	
11:17:12	10	Q	How long have you known him?	
11:17:14	11	A	I don't remember.	
11:17:14	12	Q	Ten years?	
11:17:20	13	A	I don't remember.	
11:17:21	14	Q	Could it be 10 years? Best estimate?	
11:17:25	15	A	I don't know.	
11:17:28	16	Q	More than five years you've known Tory?	
11:17:34	17	A	I don't know.	
11:17:35	18	Q	Okay. More than two years you've known Tory?	
11:17:37	19	A	Yes.	
11:17:38	20	Q	More than three years?	
11:17:39	21	A	I don't know.	
11:17:41	22	Q	You knew him at the time of the shooting;	
11:17:44	23	correct?		
11:17:44	24	A	I don't know when the shooting happened.	
11:17:46	25	Q	July 12th, 2020.	

11:17:48	1	A I don't remember.		
11:17:49	2	Q Okay. So you knew him at tri	al and that was	
11:17:54	3	2022.		
11:17:55	4	A Was it?		
11:17:55	5	Q Yes. How did you end up goin	g to Tory's	
11:17:58	6	trial?		
11:17:58	7	A I drove.		
11:17:59	8	Q You drove. Great.		
11:18:02	9	How did you end up knowing To	ry well enough to	
11:18:06	10	end up going to his trial to support hi	m?	
11:18:11	11	A I I don't know if I went t	here to support	
11:18:13	12	him. I went to the trial. I don't kno	w how.	
11:18:17	13	Q Okay. Well, if you were ther	e to support him,	
11:18:19	14	what were you there for?		
11:18:22	15	A I don't remember.		
11:18:23	16	Q Tory was sitting on UTP's Adv	isory Board;	
11:18:30	17	correct?		
11:18:32	18	A Sure.		
11:18:33	19	Q Including at the time of the	trial?	
11:18:36	20	A I don't remember.		
11:18:38	21	Q Tory was also contributing fi	nancially to the	
11:18:40	22	organization; correct?		
11:18:42	23	A I don't remember.		
11:18:44	24	MS. HAYRAPETIAN: I'd like to	mark as	
11:18:45	25	Exhibit Number 77. This is Tab 5.		

11:19:28	1	MS. DIXON: The previous was 76.
11:19:29	2	MS. HAYRAPETIAN: Yeah.
11:19:47	3	(Exhibit 77 was marked for identification.)
11:19:47	4	BY MS. HAYRAPETIAN:
11:19:48	5	Q Okay. So this is a Instagram post from Unite
11:19:57	6	the People. And I'll read the caption of the post first
11:20:04	7	which states, "Hello, my name is Ceasar McDowell, CEO of
11:20:08	8	Unite the People. As you may know, Grammy
11:20:10	9	Award-nominated artist and philanthropist Tory Lanez is
11:20:13	10	a three-year member of the advisory board of our
11:20:15	11	organization. As a whole, we stand for fighting against
11:20:19	12	social injustices, including the prosecution of innocent
11:20:21	13	people. As you also know, Tory is currently on trial
11:20:24	14	and being egregiously accused of something he did not
11:20:27	15	do."
11:20:29	16	What basis do you have for claiming Tory's
11:20:31	17	innocence?
11:20:34	18	A Are you talking to me?
11:20:35	19	Q Yes.
11:20:36	20	A What basis do I have for what?
11:20:37	21	Q Claiming Tory's innocent. Or, quote, "being
11:20:41	22	egregiously accused of something he did not do."
11:20:44	23	What's your basis for that statement?
11:20:46	24	A The basis for that statement? It said what
11:20:50	25	again? That he was egregiously where is that? Let

11:20:54	1	me read that to you. Where is it at?
11:20:56	2	Q It's the last line of your Instagram caption.
11:21:00	3	A Last line
11:21:01	4	Q On the right side.
11:21:02	5	A "Tory is currently on trial and being
11:21:07	6	egregiously accused of something he did not do." I
11:21:11	7	stand by that.
11:21:12	8	Q Okay. On what basis?
11:21:14	9	A On I believe he was let me read it again.
11:21:16	10	"Currently on trial for being egregiously accused of
11:21:21	11	something he did not do." On that basis.
11:21:24	12	Q Okay. And how do you know he did not do it?
11:21:29	13	A 'Cause I know he did not do it.
11:21:32	14	Q Because he told you he did not do it?
11:21:33	15	A Because I know he did not do it.
11:21:35	16	Q And how did you come to know he did not do it?
11:21:38	17	A 'Cause that's what I believe.
11:21:39	18	Q Okay. And why do you believe that?
11:21:42	19	A Because he is a great guy.
11:21:43	20	Q Okay. Keeping I'm going to continue
11:21:49	21	reading. [As read] Keeping in line with our common
11:21:52	22	goals, mission, and reform efforts, all areas that Tory
11:21:55	23	has avidly aided Unite the People Inc
11:21:59	24	A Where were you reading that? I don't see
11:22:00	25	that.

11:22:01	1	Q This is in the
11:22:02	2	A The black?
11:22:02	3	Q post on the left. Yes. Correct. On the
11:22:06	4	black.
11:22:06	5	[As read] So Tory avidly aided Unite the
11:22:09	6	People Inc. physically and monetarily. We would love
11:22:11	7	for all of you, his friends, family, and fans, to rally
11:22:14	8	and show a united front to protest these charges.
11:22:21	9	And then it says, "Sincerely, Ceasar McDowell,
11:22:24	10	CEO," and some of your information.
11:22:27	11	Do you recall making that post?
11:22:29	12	A I don't remember.
11:22:37	13	Q Any reason to doubt these are your words?
11:22:39	14	A I would absolutely doubt that these are my
11:22:41	15	words.
11:22:44	16	Q You would, or you wouldn't?
11:22:45	17	A I would.
11:22:46	18	Q You would?
11:22:46	19	A Uh-huh.
11:22:47	20	Q So someone else just went on Unite the
11:22:51	21	People's Instagram account and posted on your behalf?
11:22:55	22	A No. I just don't know if these are my exact
11:22:57	23	words. I don't know where you got it from. I'm looking
11:22:59	24	at this piece of paper but
11:23:02	25	Q Okay. Well, you are welcome to pull out your

11:23:04	1	Instagram	and go to this post and compare it.
11:23:08	2		Do you want to do that, if you don't believe
11:23:10	3	me? We ha	ave time. We can do it on a break.
11:23:13	4	А	We can do it all day.
11:23:14	5	Q	Yeah.
11:23:14	6	А	Hey, I have nothing to do today.
11:23:16	7	Q	Same. I'm so glad.
11:23:16	8	А	You feel me. That's what I'm talking about.
11:23:16	9	Yeah.	
11:23:17	10		You want to do lunch after this?
11:23:19	11	Q	Actually, we ordered lunch so, yeah.
11:23:21	12	A	Did you?
11:23:21	13	Q	Yeah, yeah.
11:23:21	14	А	I would not eat nothing from you people.
11:23:23	15	Q	That's unfortunate.
11:23:24	16	А	Yeah.
11:23:24	17	Q	I'm not making it. But okay.
11:23:29	18		So this is a post from Unite the People, and
11:23:34	19	you belie	ve Tory is innocent.
11:23:35	20		Did anyone else at UTP attend Tory's trial?
11:23:41	21	А	Yeah. I'm sure they did.
11:23:43	22	Q	Do you remember who?
11:23:44	23	A	No.
11:23:44	24	Q	Was Mr. Hayden there?
11:23:45	25	A	I don't remember.

			7
11:23:47	1	Q	You
11:23:48	2	A	He is right here.
11:23:50	3		MR. HAYDEN: I can't answer. You have to
11:23:51	4	answer.	
11:23:52	5		THE WITNESS: Oh, okay.
11:23:52	6		I don't remember.
11:23:52	7	BY MS. HA	YRAPETIAN:
11:23:53	8	Q	Did UTP help out with Tory's defense before or
11:23:56	9	during th	ne trial?
11:23:57	10	A	I don't remember.
11:23:58	11	Q	Did UTP begin when did UTP begin
11:24:00	12	represent	ing Tory?
11:24:02	13	A	That, I don't remember.
11:24:04	14	Q	The other stuff you did remember.
11:24:06	15		You just weren't telling me?
11:24:07	16	A	Which stuff?
11:24:08	17	Q	Well, I just asked did UTP "when did UTP
11:24:11	18	begin rep	presenting Tory?"
11:24:12	19		And you said, "That, I don't remember."
11:24:14	20	A	That, I don't remember.
11:24:15	21	Q	So the other stuff you remembered?
11:24:16	22	A	No. I said what I don't remember.
11:24:18	23		We got all day; right?
11:24:20	24	Q	Yeah.
11:24:20	25	A	Let's do it.

11:24:21	1	Q All day.
11:24:22	2	A Let's do it. I'm with it.
11:24:27	3	Q Okay. Did you attend every day of Tory's
11:24:30	4	trial?
11:24:31	5	A I don't remember.
11:24:31	6	Q Did you attend most days?
11:24:32	7	A I don't remember.
11:24:33	8	Q You met Ms. Cooper in person at Tory's
11:24:35	9	criminal trial; correct?
11:24:37	10	A I don't remember. I don't think so.
11:24:39	11	Q Okay. So if Ms. Cooper testified a few days
11:24:44	12	ago that she, quote, "I met Ceasar at trial, at the
11:24:49	13	trial of Daystar Peterson."
11:24:54	14	A She could be right. I just don't remember.
11:24:55	15	Q Okay. Was this the sorry.
11:25:04	16	Do you know who Ms. Cooper is, sitting here
11:25:06	17	today?
11:25:09	18	A I don't see her.
11:25:11	19	Q But you know her?
11:25:12	20	A Who?
11:25:13	21	Q Ms. Cooper.
11:25:13	22	A No.
11:25:14	23	Q You don't know her?
11:25:16	24	A No.
11:25:16	25	Q You don't remember meeting her at trial, but

11:25:18	1	she could have she could be
11:25:20	2	A She could have. She could be. She could be,
11:25:21	3	right.
11:25:21	4	Q And do you think that was the first time you
11:25:23	5	would have met her in person?
11:25:26	6	A I don't think I don't think I met her in
11:25:27	7	person. I don't remember. But there was a lot of
11:25:31	8	people at trial.
11:25:31	9	Did you go to the trial?
11:25:33	10	Q No.
11:25:33	11	A Oh. You weren't in criminal court?
11:25:40	12	Q I'm sorry. What did you say?
11:25:41	13	A You weren't allowed there because you are not
11:25:44	14	a criminal attorney.
11:25:45	15	Q Actually, that's not the requirement for being
11:25:47	16	in court. You you were there, and you aren't a
11:25:49	17	criminal attorney.
11:25:50	18	A Feel me. But I'm there.
11:25:54	19	Q Okay.
11:25:57	20	A You have nice hair too.
11:25:58	21	Q Thank you. I appreciate it.
11:25:59	22	A You are welcome.
11:26:01	23	Q Did you know Ms. Cooper prior to trial?
11:26:02	24	A Who?
11:26:03	25	Q Ms. Cooper, Milagro Cooper?

11:26:04	1	A The person I said I already said I didn't
11:26:06	2	know.
11:26:07	3	Q I'm just trying to see if your recollection
11:26:08	4	has been refreshed at any point throughout this day so
11:26:11	5	far.
11:26:11	6	A Okay. Cool, cool. I don't remember.
11:26:13	7	Q Okay. Do you have Ms. Cooper's phone number?
11:26:19	8	A Who?
11:26:20	9	Q Ms. Cooper's phone number?
11:26:21	10	A I don't know.
11:26:21	11	Q You don't know?
11:26:22	12	A I don't know.
11:26:23	13	Q Okay. How did you end up taking on
11:26:28	14	Ms. Cooper's case?
11:26:29	15	A I don't remember.
11:26:30	16	Q Did you exchange phone numbers with
11:26:38	17	Ms. Cooper?
11:26:39	18	A I don't remember.
11:26:40	19	Q Did you exchange any documents or notes with
11:26:42	20	Ms. Cooper during Tory's trial?
11:26:44	21	A I don't remember.
11:26:45	22	Q At any point during the trial, did you convey
11:26:47	23	any information to Ms. Cooper?
11:26:49	24	A I do not remember.
11:26:51	25	Q At any point during the trial, did you

11:26:52	1	communicate any information to Ms. Cooper at the request
11:26:55	2	of Tory?
11:26:56	3	A I don't remember.
11:26:58	4	Q How about anyone else in his circle?
11:27:00	5	A I don't remember.
11:27:00	6	Q What information did you communicate to
11:27:04	7	Ms. Cooper during Tory's trial at his request or that of
11:27:07	8	anyone in his circle?
11:27:09	9	MR. HAYDEN: Objection. Speculation.
11:27:11	10	BY MS. HAYRAPETIAN:
11:27:11	11	Q You don't remember that either?
11:27:12	12	A No.
11:27:13	13	Q Okay. But you did communicate information
11:27:19	14	from Tory?
11:27:20	15	MR. HAYDEN: Objection. Speculation.
11:27:22	16	THE WITNESS: I don't remember.
11:27:22	17	BY MS. HAYRAPETIAN:
11:27:23	18	Q So you don't
11:27:26	19	MS. DIXON: Objection. Assuming facts
11:27:32	20	THE COURT REPORTER: I can't I can't hear
11:27:32	21	her.
11:27:32	22	Can you repeat that, please?
11:27:30	23	MS. DIXON: Assuming facts not in evidence.
11:27:33	24	BY MS. HAYRAPETIAN:
11:27:34	25	Q So you don't remember what information you

11:27:39	1	communicated to Ms. Cooper from Tory?
11:27:42	2	MR. HAYDEN: Objection. Same objections.
11:27:43	3	THE WITNESS: Are you insinuating that I did?
11:27:45	4	BY MS. HAYRAPETIAN:
11:27:46	5	Q I'm asking
11:27:47	6	A I just told you that I don't remember, but
11:27:49	7	you're insinuating that I did. I said, "I don't
11:27:50	8	remember."
11:27:50	9	Q Actually, sir, I wasn't done with my question;
11:27:52	10	so
11:27:52	11	A Actually, I answered.
11:27:54	12	MR. HAYDEN: Wait until she's finished.
11:27:55	13	BY MS. HAYRAPETIAN:
11:27:56	14	Q I am trying to get clarification on what it is
11:27:58	15	you don't remember.
11:27:59	16	A Oh. Okay.
11:27:59	17	Q On
11:28:00	18	A It seems like you are trying to say I did
11:28:02	19	something. That's what it seems like to me.
11:28:05	20	Q Well
11:28:06	21	A Okay.
11:28:06	22	Q if you let me finish my question
11:28:08	23	A Sure.
11:28:08	24	Q I think we can get to where we need to get.
11:28:10	25	A Which which one, though? You just

11:28:11	1	finished, and I was still answering. Then you started
11:28:14	2	again, while I was still answering, but you said you are
11:28:16	3	not finished.
11:28:17	4	Q So what what is it that you don't remember?
11:28:21	5	A Anything.
11:28:21	6	Q You don't remember if you gave information?
11:28:28	7	Or you know you didn't give information? Or you don't
11:28:31	8	remember what information you gave?
11:28:34	9	MS. DIXON: Objection. It's a compound
11:28:36	10	question. Vague and ambiguous.
11:28:40	11	THE WITNESS: Are you done?
11:28:40	12	BY MS. HAYRAPETIAN:
11:28:41	13	Q I'm done.
11:28:42	14	A Oh, okay. I don't remember.
11:28:43	15	Q Tory is UTP's most well-known client; correct?
11:28:55	16	MR. HAYDEN: Objection. Speculation.
11:28:59	17	THE WITNESS: Are you done? I don't know.
11:29:01	18	BY MS. HAYRAPETIAN:
11:29:02	19	Q You don't know?
11:29:03	20	A Huh-uh.
11:29:04	21	Q Do you have any clients that are more
11:29:12	22	well-known than Tory?
11:29:14	23	MR. HAYDEN: Objection. Speculation.
11:29:15	24	Relevance.
11:29:18	25	THE WITNESS: I don't remember.

	1	
11:29:18	1	BY MS. HAYRAPETIAN:
11:29:19	2	Q Tory attracts significant media coverage and
11:29:21	3	publicity for UTP; correct?
11:29:23	4	MR. HAYDEN: Objection. Speculation.
11:29:25	5	THE WITNESS: I don't know.
11:29:26	6	BY MS. HAYRAPETIAN:
11:29:26	7	Q Potential clients reach out to UTP because
11:29:28	8	they know UTP represents Tory; correct?
11:29:30	9	MR. HAYDEN: Objection. Speculation.
11:29:33	10	THE WITNESS: I don't know.
11:29:33	11	BY MS. HAYRAPETIAN:
11:29:34	12	Q UTP has donors who contribute financially
11:29:36	13	because of Tory; correct?
11:29:38	14	MR. HAYDEN: Objection. Speculation.
11:29:39	15	Assuming facts not in evidence.
11:29:41	16	THE WITNESS: I don't know.
11:29:41	17	BY MS. HAYRAPETIAN:
11:29:42	18	Q In fact, donors give with a specific intent of
11:29:45	19	supporting the Free Tory Movement; correct?
11:29:48	20	MR. HAYDEN: Same objections.
11:29:50	21	THE WITNESS: I don't know.
11:29:50	22	BY MS. HAYRAPETIAN:
11:29:51	23	Q UTP racks up the highest costs and fees in
11:29:53	24	representing Tory?
11:29:54	25	MR. HAYDEN: Same objections.

11:29:57 1 THE WITNESS: Say that again. Just let	: me
11:29:58 2 hear you say it again because I don't I didn't	hear
11:30:00 3 it. Go ahead.	
11:30:01 4 BY MS. HAYRAPETIAN:	
11:30:02 5 Q UTP racks up the highest costs and fees	; in
11:30:04 6 representing Tory; correct?	
11:30:06 7 A UTP I want you to explain that, plea	ıse.
11:30:08 8 Q Okay. Let's break it down.	
11:30:10 9 A Let's break it down.	
11:30:11 10 Q UTP	
11:30:12 11 A Uh-huh.	
11:30:12 12 Q racks up	
11:30:13 13 A What?	
11:30:13 14 Q its highest costs and fees in repres	senting
11:30:17 15 Tory.	
11:30:18 16 A No.	
11:30:19 17 Q No. What what case brings you in mo	re
11:30:21 18 money than Tory's?	
11:30:23 19 A Damn near everyone.	
11:30:24 20 Q Really?	
11:30:25 21 A Yeah.	
11:30:25 22 Q Why is that?	
11:30:28 23 A Because it's a lot more of them.	
11:30:31 24 Q Okay. But I'm talking about what's you	ır most
11:30:36 25 expensive case? The one that brings you in the m	ıost

11:30:40	1	money?
11:30:41	2	A I don't know.
11:30:42	3	Q But it's not Tory's?
11:30:43	4	A I don't know.
11:30:46	5	Q Okay. Tory has Tory contributes
11:30:52	6	financially to UTP outside of his own legal fees;
11:30:54	7	correct?
11:30:54	8	A I don't know.
11:30:56	9	Q Okay. Tory has helped pay the legal fees of
11:30:58	10	other clients represented by UTP; correct?
11:31:01	11	A I don't know.
11:31:02	12	Q And he has also help pay the fees for
11:31:05	13	Ms. Cooper; correct?
11:31:06	14	MR. HAYDEN: Objection. Speculation.
11:31:11	15	THE WITNESS: What was the question? I was
11:31:12	16	coughing. I'm sorry.
11:31:12	17	BY MS. HAYRAPETIAN:
11:31:13	18	Q No problem.
11:31:14	19	Tory has also helped pay the fees for
11:31:17	20	Ms. Cooper; correct?
11:31:18	21	A No.
11:31:20	22	Q That one, you remember?
11:31:22	23	A What did I say?
11:31:23	24	Q You said, "No."
11:31:23	25	A Then I must have remembered.

11:31:26	1	Q Shocked. I know. You remembered something.
11:31:28	2	A I must have remembered. I must have
11:31:29	3	remembered.
11:31:31	4	MS. DIXON: Objection. That's argumentative.
11:31:32	5	MS. HAYRAPETIAN: Is it?
11:31:32	6	MS. DIXON: Yeah. The way you are talking
11:31:35	7	with him is argumentative.
11:31:37	8	MS. HAYRAPETIAN: Thank you.
11:31:39	9	THE WITNESS: I agree with her.
11:31:40	10	BY MS. HAYRAPETIAN:
11:31:40	11	Q Let's see how long it is you are going to
11:31:48	12	agree with her for. Just hang out. Stay with me.
11:31:54	13	A I'm here. Let's do it.
11:31:55	14	Q Come back to me when we get on page 50 of my
11:31:58	15	outline.
11:31:59	16	A Sure. Let's do it. Let's do it.
11:32:00	17	Let me know when we're at page 50, please.
11:32:03	18	Q I will.
11:32:03	19	A All right.
11:32:04	20	Q Okay. So according to your website,
11:32:09	21	Tory Lanez stopped by the Unite the People office in
11:32:12	22	Downtown Long Beach and donated \$50,000 to pay off the
11:32:18	23	legal fees for 30 families.
11:32:20	24	Do you recall that?
11:32:22	25	A I don't remember.

11:32:23	1	Q Okay.
		-
11:32:24	2	MS. HAYRAPETIAN: Let's mark Exhibit
11:32:25	3	Number 78, and we're going to pull up Tab 22, please.
11:32:32	4	(Exhibit 78 was marked for identification.)
11:33:04	5	MS. HAYRAPETIAN: Okay. Let's head towards
11:33:05	6	page 3 which has and I'll just represent this is a
11:33:15	7	screen grab from UTP's website. The capture link is all
11:33:21	8	on page 1. And on page 3, there is an article link
11:33:28	9	about Tory Lanez donating \$50,000.
11:33:40	10	BY MS. HAYRAPETIAN:
11:33:40	11	Q So who are the clients Tory helped pay legal
11:33:43	12	fees for?
11:33:46	13	Do you want to go to page 3 so you can follow
11:33:48	14	along?
11:33:49	15	A It's my website.
11:33:52	16	Q Oh, you remember?
11:33:53	17	A It's my website.
11:33:54	18	Q Awesome. Okay.
11:33:55	19	So we just read Tory Lanez stopped by, donated
11:33:59	20	\$50,000 to pay off the legal fees for 30 families.
11:34:04	21	A That's what it says.
11:34:05	22	Q Yeah. Which clients of yours did Tory pay
11:34:10	23	fees for?
11:34:11	24	A I don't remember.
11:34:13	25	Q Okay. But that included Ms. Cooper; right?

11:34:16	1	MR. HAYDEN: Objection. Speculation.
11:34:17	2	Assuming facts not in evidence.
11:34:23	3	THE WITNESS: You are funny.
11:34:23	4	BY MS. HAYRAPETIAN:
11:34:24	5	Q Thanks.
11:34:27	6	A You are trying. You are trying.
11:34:30	7	MS. DIXON: Just a point of clarification,
11:34:30	8	there's no date on this. And he apparently stopped by
11:34:33	9	in person; so he wasn't incarcerated. He has been
11:34:37	10	incarcerated during all times pending this this
11:34:41	11	particular lawsuit; so I'm going to object based on
11:34:43	12	relevance.
11:34:44	13	MS. HAYRAPETIAN: Okay. Well, your objections
11:34:46	14	are noted, and they're improper because they're speaking
11:34:49	15	objections; so stop coaching the witness from the left
11:34:51	16	side of the room. And if actually
11:34:53	17	MS. DIXON: I'm not coaching the witness. I
11:34:54	18	don't know what the date is.
11:34:55	19	MS. HAYRAPETIAN: Let me speak. Ronda.
11:34:56	20	MS. DIXON: If he was out of custody,
11:34:57	21	obviously, it's not relevant because he was in custody
11:34:59	22	the whole time.
11:35:00	23	MS. HAYRAPETIAN: Ronda, let me let me
11:35:01	24	finish. I don't interrupt you when you are speaking,
11:35:03	25	please.

11:35:03	1	MS. DIXON: Objection. Relevance.
11:35:04	2	MS. HAYRAPETIAN: I don't interrupt you when
11:35:05	3	you are speaking. Please, provide me the same courtesy
11:35:09	4	and respect.
11:35:10	5	And, if you were to look on page 3, on the
11:35:12	6	left side of the screenshot, from "TMZ," a screenshot,
11:35:15	7	that was posted by UTP on its website. The date very
11:35:20	8	clearly states "May 17, 2023." And I think if you
11:35:25	9	looked back, he was not in prison.
11:35:27	10	MS. DIXON: He was incarcerated.
11:35:28	11	MS. HAYRAPETIAN: Was he?
11:35:29	12	MS. DIXON: Yes.
11:35:29	13	MS. HAYRAPETIAN: Okay. Great. So
11:35:30	14	MS. DIXON: I know for a fact because I
11:35:31	15	visited him during that time. He was incarcerated.
11:35:33	16	Since the time of his the time that he got convicted,
11:35:38	17	which was in December of 2022, he was he was
11:35:41	18	incarcerated on May of 2023.
11:35:44	19	MS. HAYRAPETIAN: Okay. Great. So maybe you
11:35:45	20	want to check to see when his sentencing hearing was.
11:35:48	21	And
11:35:50	22	MS. DIXON: I know when it was.
11:35:50	23	MS. HAYRAPETIAN: Okay.
11:35:56	24	MS. DIXON: I was
11:35:56	25	MS. HAYRAPETIAN: Great. So

11:35:56	1	(The Court Reporter requested clarification.)
11:35:57	2	MS. DIXON: I was there.
11:35:58	3	MS. HAYRAPETIAN: Move to strike.
11:36:00	4	And please refrain from any more talking
11:36:04	5	objections to coach the witness.
11:36:08	6	MS. DIXON: I'm not coaching the witness. I'm
11:36:09	7	just giving you some information that you must not have,
11:36:12	8	because obviously he was incarcerated throughout the
11:36:15	9	entire pendency of this particular motion. This
11:36:19	10	complaint that you have right now, he has been
11:36:21	11	incarcerated the whole time.
11:36:23	12	MS. HAYRAPETIAN: Okay. Well
11:36:24	13	MS. DIXON: So for him to pay for my client
11:36:25	14	you are you are saying he is paying my client's fees
11:36:27	15	in person. He couldn't have done that because he was
11:36:30	16	incarcerated.
11:36:31	17	MS. HAYRAPETIAN: That's not actually what I
11:36:32	18	said but okay.
11:36:33	19	MS. DIXON: That's what you are getting at.
11:36:34	20	BY MS. HAYRAPETIAN:
11:36:35	21	Q How much how much has Tory paid UTP in
11:36:36	22	legal fees, in total?
11:36:38	23	A I don't know.
11:36:39	24	Q How much has Tory paid UTP in donations or
11:36:41	25	voluntary contributions?

11:36:43	1	A I don't know.
11:36:44	2	Q What other items of value has Tory provided
	3	
11:36:47		UTP?
11:36:48	4	A I don't know.
11:36:49	5	Q What is the total amount of money Tory has
11:36:52	6	paid UTP?
11:36:53	7	A I don't know.
11:36:53	8	Q On April 7, 2025, Tory's father,
11:37:01	9	Mr. Sonstar Peterson, testified during his deposition
11:37:08	10	in this case, quote, "Tory is on the board of an
11:37:12	11	organization right here in California. I believe their
11:37:16	12	office is run out of Long Beach, and it's what's it
11:37:20	13	called Unite the People. He was on the board
11:37:23	14	fighting for criminal justice for the longest time, so
11:37:26	15	whatever he has paid has come directly out of his own
11:37:29	16	pocket. In fact, I'm sure you've seen video footage of
11:37:33	17	either Unite the People talking about that. According
11:37:37	18	to Sonstar, Tory's dad, Tory is central to various UTP
11:37:41	19	programs including the, quote, 'Hands of God Project'."
11:37:46	20	That's correct; right? All that is correct?
11:37:48	21	A I don't remember.
11:37:48	22	MR. HAYDEN: Objection. Narrative. Compound.
11:37:51	23	BY MS. HAYRAPETIAN:
11:37:52	24	Q Tory has supported UTP, quote, "directly out
11:37:54	25	of his pocket"; correct?

11:37:55	1	A I don't know.
11:37:56	2	MR. HAYDEN: Objection. Speculation.
11:37:57	3	BY MS. HAYRAPETIAN:
11:37:58	4	Q Any reason to think Tory's dad is lying under
11:38:01	5	oath?
11:38:02	6	MR. HAYDEN: Objection. Speculation.
11:38:03	7	THE WITNESS: I don't remember.
11:38:03	8	BY MS. HAYRAPETIAN:
11:38:06	9	Q Tory's also sat on the board of UTP; correct?
11:38:09	10	A I don't remember.
11:38:10	11	Q How long has Tory been on the board of UTP?
11:38:14	12	A I just said, "I don't remember."
11:38:16	13	Q How did Tory become a UTP board member?
11:38:19	14	A I don't remember.
11:38:20	15	Q Is being on the board the same as being an
11:38:24	16	advisory member?
11:38:26	17	A I don't remember.
11:38:27	18	Q You don't know, as the CEO of your own
11:38:29	19	company, if being on the board is the same as being
11:38:33	20	A You don't mind if I roll one of these while we
11:38:35	21	talk; right?
11:38:36	22	Q I can't control you, unfortunately.
11:38:38	23	A Unfortunately. You would like to control me?
11:38:46	24	Q Okay. Next question.
11:38:49	25	A Let's do it. Seven hours. Love it.

11:38:54	1	Q How did Tory advise UTP?
11:38:58	2	A I don't know.
11:38:59	3	Q What does Tory do as an advisory member?
11:39:02	4	A I don't know.
11:39:03	5	Q Is Tory compensated for being an advisory
11:39:05	6	member?
11:39:06	7	A I don't know.
11:39:07	8	Q So Tory funds UTP, he advises UTP, he solicits
11:39:19	9	donations for UTP, and he attracts new clients for UTP.
11:39:24	10	MS. DIXON: Objection. Assumes facts not in
11:39:25	11	evidence. And calls for speculation.
11:39:26	12	BY MS. HAYRAPETIAN:
11:39:26	13	Q And raises
11:39:28	14	MS. HAYRAPETIAN: Can you Ronda, I'm in the
11:39:30	15	middle of my question. Please, stop interrupting.
11:39:33	16	MS. DIXON: I'm not interrupting. I'm
11:39:34	17	objecting.
11:39:35	18	MS. HAYRAPETIAN: Don't object until I am done
11:39:38	19	with my question. Allow me a modicum of courtesy,
11:39:42	20	seriously.
11:39:43	21	MR. HAYDEN: Take a couple seconds to
11:39:44	22	object before you answer.
11:39:46	23	THE WITNESS: Sure.
11:39:47	24	MS. HAYRAPETIAN: No. The witness is actually
11:39:48	25	doing fine. It's Counsel that is very unprofessionally

11:39:53	1	interjecting objections in the middle of my question.
11:39:56	2	MS. DIXON: The question is very long.
11:39:57	3	Can we just make it a simple question?
11:40:00	4	MS. HAYRAPETIAN: Stop.
11:40:09	5	THE WITNESS: So I'm going to go take a
11:40:10	6	cigarette break.
11:40:12	7	MS. HAYRAPETIAN: I'm in the middle of a
11:40:13	8	question.
11:40:14	9	THE WITNESS: Sorry. I don't know.
11:40:14	10	BY MS. HAYRAPETIAN:
11:40:15	11	Q You don't know. Okay.
11:40:17	12	Without Tory UTP would go underwater; right?
11:40:20	13	MR. HAYDEN: Objection. Speculation.
11:40:26	14	BY MS. HAYRAPETIAN:
11:40:26	15	Q Do you have an answer?
11:40:28	16	A I don't know.
11:40:30	17	Q Sir?
11:40:30	18	A You are done with your question; right? I
11:40:32	19	just answered "I don't know."
11:40:35	20	MR. HAYDEN: Stay.
11:40:35	21	BY MS. HAYRAPETIAN:
11:40:36	22	Q Sir, we need to agree when it's time to take a
11:40:38	23	break.
11:40:38	24	A Okay. Well, I'm gonna go take a break because
11:40:38	25	I gotta pee and smoke, so you can agree.

11:40:41	1	Q I will allow you to take
11:40:42	2	A I don't need you to allow me. I'm going to go
11:40:44	3	pee and smoke.
11:40:45	4	Q Let me finish. I have one question left.
11:40:46	5	A No, no. You are just saying I finished the
11:40:47	6	question. You just finished your question, and I
11:40:49	7	answered. I gotta go pee. Now, I can pee here, or I
11:40:53	8	can pee in the bathroom.
11:40:54	9	MR. HAYDEN: Let's just get through her
11:40:55	10	question.
11:40:55	11	Let's move this along, guys everybody.
11:40:57	12	Come on.
11:40:58	13	THE WITNESS: I told you what I'm going to do.
11:40:59	14	I'm going to go use the restroom.
11:41:03	15	MS. HAYRAPETIAN: Please, have the record
11:41:03	16	reflect that the witness has walked off in the middle of
11:41:06	17	my questioning.
11:41:07	18	THE WITNESS: You know, your question was
11:41:08	19	done. You just told me. I gotta go.
11:41:13	20	MS. DIXON: It's only 10 minutes.
11:41:14	21	STENO TECH: Do we need do we need to go
11:41:14	22	off the record?
11:41:14	23	MS. HAYRAPETIAN: We can go off the record,
11:41:14	24	yeah.
11:41:16	25	THE VIDEOGRAPHER: The time is 11:41 AM

11:41:18	1	Pacific Time. We are now off the record.
11:41:25	2	(Recess was taken.)
11:57:52	3	THE VIDEOGRAPHER: The time is 12:05 PM
12:05:41	4	Pacific time. We are back on the record.
12:05:45	5	MS. HAYRAPETIAN: Okay. So, at the break, we
12:05:48	6	checked the "TMZ" article that we were discussing that's
12:05:55	7	posted on the UTP website, and we confirmed that the
12:05:58	8	date is September 17, 2021; so before trial started, not
12:06:02	9	2023. And I think that resolves the issue of where Tory
12:06:10	10	was. Okay.
12:06:20	11	BY MS. HAYRAPETIAN:
12:06:20	12	Q Mr. McDowell, before Ms. Pete filed this
12:06:21	13	lawsuit, UTP passed on information about Tory's appeal
12:06:25	14	to Ms. Cooper for her to then post on social media;
12:06:29	15	correct?
12:06:30	16	A I don't remember.
12:06:31	17	MR. HAYDEN: Objection. Speculation.
12:06:31	18	BY MS. HAYRAPETIAN:
12:06:32	19	Q Ms. Cooper produced four emails she exchanged
12:06:36	20	with a member of UTP's legal team
12:06:38	21	Ms. Jazmyne Jamison.
12:06:43	22	MS. HAYRAPETIAN: And I'd to mark for the
12:06:45	23	record Exhibit Number 79 as Tab 6 and I'm sorry. I'm
12:06:56	24	going to have to pause for a moment.
12:06:59	25	It looks like we've had new people join

12:07:02	1	Mr. McLymont and I just wanted to get his appearance
12:07:10	2	on the record.
12:07:10	3	And moving forward, I'm going to ask anyone
12:07:14	4	attending remotely to state their appearance and confirm
12:07:19	5	that they are alone and no one is present or plans to be
12:07:24	6	present for the remainder of the testimony here today.
12:07:32	7	MR. MCLYMONT: This is attorney
12:07:34	8	Jeremy McLymont. I joined the Zoom right before we took
12:07:37	9	a break the last break.
12:07:41	10	MS. HAYRAPETIAN: And you can confirm your
12:07:42	11	alone and plan to be alone for the duration of this
12:07:45	12	testimony?
12:07:46	13	MR. MCLYMONT: Yes.
12:07:47	14	MS. HAYRAPETIAN: Thank you.
12:07:51	15	Okay. I'm going to pass out Exhibit
12:08:00	16	Number 79.
12:08:02	17	(Exhibit 79 was marked for identification.)
12:08:02	18	BY MS. HAYRAPETIAN:
12:08:02	19	Q Okay. Who is Ms. Jamison?
12:08:32	20	Mr. McDowell.
12:08:34	21	A Hey.
12:08:34	22	Q Who is Ms. Jamison, Jazmyne Jamison?
12:08:38	23	A One of the people that helped us with social
12:08:41	24	media, I think.
12:08:42	25	Q Okay. And, before the break, you had a chance

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CEASAR MCDOWELL JULY 25, 2025

12:08:48	1	to go out	side, use the restroom, and I'm assuming finish
12:08:53	2	your join	ıt?
12:08:55	3	А	My joint?
12:08:56	4	Q	Yeah. Is that what it was?
12:09:00	5		MS. DIXON: He said he was smoking a
12:09:01	6	cigarette	2.
12:09:07	7		THE WITNESS: Is there a question?
12:09:08	8	BY MS. HA	YRAPETIAN:
12:09:08	9	Q	Yeah.
12:09:09	10	A	You are serious?
12:09:10	11	Q	Yes.
12:09:10	12	А	Did I go outside and smoke a joint?
12:09:12	13	Q	Yes.
12:09:14	14	А	Now you are being disrespectful.
12:09:15	15	Q	No, I'm not. I noticed you were rolling up
12:09:18	16	something	on the record. And I get to ask if you are
12:09:21	17	under the	e influence
12:09:23	18	А	If I'm rolling a joint. No. I didn't roll a
12:09:25	19	joint or	smoke a joint.
12:09:26	20	Q	Okay.
12:09:27	21	А	Did you?
12:09:27	22	Q	You did not smoke marijuana?
12:09:28	23	А	Did you? Wow. I just answered the question.
12:09:32	24		MR. HAYDEN: You can answer what the product
12:09:33	25	is.	

```
It's not her business.
 1
               THE WITNESS:
 2
     BY MS. HAYRAPETIAN:
 3
               Actually, if you are under the influence and
     cannot answer my questions, it is my business.
 4
 5
               It's not her business what it was. I just
     said it wasn't marijuana.
 6
               Okay. So Ms. Jamison was someone handling
 7
          Q
     your social media. And looking at this email, from
 8
 9
    Ms. Jamison on Tuesday, December 12th, 2023, the email
10
     was sent to three individuals -- three individuals --
11
     milagrogramz@, torylanezdaily@
                                                     , and
12
     tia@teawithtia.org.
13
               Do you see that on page 1? Top of the page in
                    Yes?
14
     the to section.
15
               I see this piece of paper says that.
16
               Okay. So all three individuals are bloggers
          0
17
     and vocal supports of Tory Lanez; correct?
18
               I don't think so. I don't know.
19
               So torylanezdaily@ is not a vocal
20
     supporter of Tory?
21
               I don't know.
         Α
2.2
               Okay. If we scroll all the way down to page 4
23
     of 6, in this document produced by the Defendant
24
     Ms. Cooper, Ms. Jamison wrote, "Hey, ladies, as
25
     mentioned, the writ of habeas corpus for Daystar is
```

12:11:11	1	attached."
12:11:11	2	Do you see that?
12:11:14	3	A I see the paper says that.
12:11:17	4	Q UTP sent to Ms. Cooper and the other bloggers
12:11:19	5	a copy of Tory's writ of habeas corpus so they could
12:11:24	6	post about it on their social media; correct?
12:11:27	7	A No. I don't see that. Where is that at?
12:11:30	8	Q So what did they send this for?
12:11:33	9	A I'm looking at a bunch of letters.
12:11:34	10	What are you talking about where is writ of
12:11:38	11	habeas corpus? Are you assuming what it is?
12:11:41	12	Q I'm not assuming.
12:11:41	13	A Are you saying it's a where it is?
12:11:44	14	Q States, "Hey, ladies, as mentioned, the writ
12:11:46	15	of habeas corpus for Daystar is attached." The format
12:11:50	16	that Ms. Cooper has produced this in.
12:11:53	17	A I don't see a writ of habeas corpus; so I'm
12:11:55	18	going to answer no.
12:11:56	19	Q Okay. So at any point did UTP send documents
12:12:02	20	to Ms. Cooper and others to post on social media?
12:12:07	21	A I don't remember.
12:12:10	22	Q And looking at this email, you don't remember?
12:12:14	23	A This email says it was sent from me?
12:12:19	24	Q Let's go to
12:12:20	25	A It says it was sent from Jazmyne Jamison, I

```
1
     think.
 2
               Actually, if you go to the following page, you
 3
     can see that the email chain starts from you.
 4
          Α
               What page? Where is that at?
 5
               5.
                   Page 5.
                    I don't see that the email chain has
 6
               No.
 7
     started from me, and I don't see a writ of
 8
     habeas corpus.
 9
          0
               Okay.
10
               I just see a whole bunch of little letters,
11
     letters, letters.
12
               Right. Yeah. And that's the format in which
          0
13
     this was produced by the defendant. You can also go --
14
               Okay. Well, I don't think it's it. I'm
15
     answering no again. I don't see that.
16
               Okay. You can also go to the bottom of page 4
          0
17
     where the message was forwarded from you, Mr. McDowell,
18
     ceasarceo@
19
               Do you see that?
20
               I see where the paper says that.
          Α
21
               Okay. And then it says, "Subject 2023, 12,
          Q
2.2
     Peterson, WHC, Appellate Court, Final to File.pdf."
23
               Do you see that?
24
          Α
               I see where the paper says that.
25
               Okay.
          Q
```

12:13:36	1	A I don't see any writ of habeas corpus.
12:13:39	2	Q Okay. Well
12:13:40	3	A So
12:13:41	4	Q Ms. Jazmyne represented that it was attached,
12:13:46	5	and the attachment
12:13:46	6	A Oh. So how come it's not here, if it was
12:13:48	7	attached?
12:13:49	8	Q Because this is how Ms. Cooper produced it.
12:13:51	9	A Well, you should have got it done right then.
12:13:53	10	Q I agree. And maybe her counsel can get us an
12:13:57	11	appropriate production of this email.
12:14:00	12	MS. DIXON: You have the you used your
12:14:04	13	resources to get it by using the log-in for her phone.
12:14:09	14	MS. HAYRAPETIAN: Actually, this was a
12:14:10	15	document produced directly from your client.
12:14:13	16	MS. DIXON: Okay.
12:14:23	17	MS. HAYRAPETIAN: Okay. Let's take a look at
12:14:24	18	Exhibit Number 80 which will be Tab 7.
12:14:44	19	(Exhibit 80 was marked for identification.)
12:14:45	20	BY MS. HAYRAPETIAN:
12:14:45	21	Q So the prior exhibit was dated an email
12:14:56	22	dated December 12th, 2023, from Unite the People to
12:14:59	23	Milagro Gramz and several bloggers.
12:15:03	24	The current exhibit, Number 80, is also an
12:15:07	25	email from Unite the People on February 27, 2024, a few

```
1
     months later, again, to Milagro Gramz,
 2
     tia@teawithtia.org, and torylanezdaily@
                                                          The
 3
     subject line states, Forward, Peterson _Filed AOB
 4
     _UTP.pdf.
 5
               Do you see that?
               I see where the paper says that.
 6
 7
          Q
               Okay. And if you scroll down to page 4 of 5,
     your email addresses is noted --
 8
 9
     ceasar mcdowell@unitethepeople.org.
10
               You asked your employee Ms. Jazmyne to then
11
     forward the documents relating to Tory's appeal to
12
     Ms. Cooper and other bloggers; right?
13
               I don't remember.
14
               And you forwarded this so the bloggers could
15
     post about it on their social media; correct?
16
               I don't remember.
          Α
17
               Tory told UTP to send these documents to
          0
18
     Ms. Cooper and other bloggers so they can --
19
               MR. HAYDEN: Objection.
                                         Sorry. Go ahead.
20
     BY MS. HAYRAPETIAN:
21
               So they could be leaked to the public;
          0
2.2
     correct?
23
               MR. HAYDEN: Objection. Speculation.
24
     Assuming facts not in evidence.
25
     BY MS. HAYRAPETIAN:
```

12:16:22	1	Q Correct?
12:16:23	2	A I don't remember.
12:16:29	3	MS. HAYRAPETIAN: Let's look at Tab 8 which
12:16:30	4	will be Exhibit Number 81.
12:16:36	5	(Exhibit 81 was marked for identification.)
12:16:39	6	THE WITNESS: Do I get a check for being here?
12:16:40	7	Everybody else got a check. Why I ain't get a check?
12:16:43	8	You got my check? I don't get a check like everybody
12:16:48	9	else?
12:16:49	10	MS. HAYRAPETIAN: We can discuss at the break.
12:16:51	11	THE WITNESS: Okay.
12:16:51	12	MR. HAYDEN: You get a gold star.
12:16:52	13	THE WITNESS: Thank you.
12:16:57	14	MS. DIXON: Did you pass out 81 yet?
12:16:58	15	MS. HAYRAPETIAN: Sorry.
12:17:20	16	BY MS. HAYRAPETIAN:
12:17:20	17	Q And when you said everyone else got a check,
12:17:22	18	what did you mean by that?
12:17:23	19	A Didn't you give anyone else a check?
12:17:26	20	Q I don't know.
12:17:26	21	Who did we give a check to?
12:17:27	22	A I don't know. I'm asking you. I don't even
12:17:30	23	care about their check.
12:17:31	24	Do I get a check?
12:17:32	25	Q I mean, you said other people everybody got

12:17:33	1	a check?
12:17:34	2	A I said, "Do I get a check?"
12:17:35	3	Q So I'm wondering who "everybody" is.
12:17:37	4	A I don't know.
12:17:38	5	Q You don't know?
12:17:39	6	A You were here, not me. I don't know.
12:17:40	7	Q But you are the one that said something about
12:17:42	8	a check.
12:17:42	9	A Do I get a check?
12:17:45	10	Q Were you talking about Tory's dad getting a
12:17:47	11	check?
12:17:48	12	A I don't know who got a check. I'm asking, "Do
12:17:50	13	I get a check."
12:17:53	14	Q Okay. Let's look at Exhibit 81 which is a
12:17:58	15	third email from Unite the People to only Milagro Gramz
12:18:03	16	this time, on August 4th, 2024, Subject is
12:18:10	17	Daystar Peterson, Attorney General's Reply Brief.
12:18:14	18	Do you see that?
12:18:19	19	A Yeah. I see where the paper says that.
12:18:22	20	Q Great. And then page 4, is your email address
12:18:26	21	listed. And you forwarded this document, Attorney
12:18:31	22	General's Response to Tory's Appeal Brief, to your
12:18:34	23	employee Ms. Jamison and told her to share it with
12:18:37	24	Ms. Cooper; correct?
12:18:41	25	A I don't see where it says that. Where does it

12:18:43	1	say share this with Ms where do you see that? I
12:18:46	2	don't see it, no.
12:18:50	3	Q Okay. But you you do see that you
12:18:52	4	forwarded this email to your employee?
12:18:54	5	A I see where this paper says my name. I don't
12:18:57	б	see where it says I forwarded it to who.
12:19:00	7	Q Do you see, in the middle of page 4, it says
12:19:03	8	forwarded message from Ceasar McDowell to Jazmyne at
12:19:08	9	Unite the People?
12:19:09	10	A Yeah. I see where that's typed on this paper.
12:19:11	11	Q And then Jazmyne takes your email and says,
12:19:13	12	"Millie, please see the attachments below. As they
12:19:17	13	pertain the AG response to Daystar. Let me know if you
12:19:20	14	have any questions or concerns."
12:19:22	15	Do you see that?
12:19:24	16	A No. What page is that?
12:19:25	17	Q That's the same page, 4, right on top of your
12:19:27	18	forwarded email.
12:19:32	19	A I don't see that.
12:19:38	20	Can you show me?
12:19:39	21	Q Uh-huh.
12:19:42	22	MS. HAYRAPETIAN: Let the record reflect, I am
12:19:43	23	marking the applicable area and tabbing it for the
12:19:47	24	witness's convenience.
12:19:50	25	THE WITNESS: Thank you. Oh, there it goes.

12:19:53	1	MS. HAYRAPETIAN: Great. Awesome. Okay.
12:19:56	2	BY MS. HAYRAPETIAN:
12:19:56	3	Q Okay. So now you see the sentence I just
12:19:58	4	wrote; right?
12:20:00	5	A I see the lines you wrote, yeah.
12:20:01	6	Q Okay. Awesome.
12:20:02	7	A You wrote these sentences?
12:20:03	8	Q No, no, no. I did not write the sentences.
12:20:05	9	A You just said the sentences you wrote.
12:20:07	10	Q I stated.
12:20:08	11	A Oh, okay. I see them.
12:20:10	12	Q Okay. And you forwarded this to your employee
12:20:17	13	so she could send is to Ms. Cooper; correct?
12:20:20	14	A No.
12:20:20	15	Q Okay. So why did you forward it to your
12:20:21	16	employee?
12:20:22	17	A I didn't say I forwarded it. You are saying
12:20:24	18	that, not me.
12:20:25	19	Q Well, the document is saying it. The document
12:20:27	20	that the defendant in this case produced.
12:20:28	21	A Oh. Okay. I don't remember.
12:20:29	22	Q You don't remember forwarding?
12:20:31	23	A I don't remember.
12:20:32	24	Q Okay. Do you remember Tory telling you to
12:20:38	25	share his case filings with bloggers?

12:20:42	1	MR. HAYDEN: Objection. Speculation.
12:20:44	2	THE WITNESS: I don't remember. I don't
12:20:45	3	remember.
12:20:46	4	BY MS. HAYRAPETIAN:
12:20:46	5	Q Okay. Do you know how Ms. Jamison became so
12:20:53	6	close to Ms. Cooper so as to start calling her by her
12:20:56	7	nickname, Millie?
12:21:00	8	MS. DIXON: Objection. Calls for speculation.
12:21:02	9	THE WITNESS: I don't remember.
12:21:03	10	BY MS. HAYRAPETIAN:
12:21:04	11	Q You don't remember?
12:21:05	12	A Huh-uh.
12:21:05	13	Q So you knew at one point, and now you don't
12:21:07	14	remember?
12:21:07	15	A I knew what at one point? I just told you I
12:21:10	16	don't know none of the Millie or Milagros or what you
12:21:14	17	just said; so how would I know that now? I said, "I
12:21:16	18	don't remember."
12:21:17	19	Q Actually, you said you don't remember which
12:21:20	20	indicates you may have known at some point; so I'm just
12:21:22	21	trying to get clarification.
12:21:24	22	Did you know at
12:21:24	23	A No. I don't remember nothing.
12:21:25	24	Q Please, let me finish my question.
12:21:27	25	A Sure.

12:21:27	1	Q	Did you know at some point and forgot, or you
12:21:29	2	never kne	ew?
12:21:30	3	A	I don't remember.
12:21:32	4	Q	You don't remember if you ever knew?
12:21:35	5	A	No. I don't remember anything.
12:21:37	6	Q	But you might have known?
12:21:39	7	A	I don't know nothing.
12:21:40	8	Q	Okay. Someone at UTP made the decision to
12:21:46	9	send thes	se documents to Ms. Cooper; correct?
12:21:49	10	A	I don't know.
12:21:49	11	Q	Okay. What is Jamison's title?
12:21:54	12	A	I don't know.
12:21:55	13	Q	You said she was social media?
12:21:58	14	A	I said she might have helped us with our
12:21:59	15	social me	edia.
12:22:00	16	Q	Okay. What else might she had helped with?
12:22:03	17	A	I don't know.
12:22:03	18	Q	So, as the CEO of Unite the People, you do not
12:22:07	19	know, sit	tting here today, what your employee Jazmyne
12:22:12	20	A	Uh-huh. I didn't tell you she was a employee.
12:22:14	21	Q	Sir?
12:22:14	22	A	You keep saying "employee."
12:22:16	23	Q	Sir?
12:22:16	24	A	Sir.
12:22:16	25	Q	I am asking a question. Please allow me to

12:22:19	1	finish
12:22:20	2	A Uh-huh. Sure.
12:22:20	3	Q before you respond.
12:22:25	4	Jaz@unitethepeople.org she has an email
12:22:31	5	address with your company's "at"; right?
12:22:39	6	A Are you done?
12:22:41	7	Q I am finished, yes.
12:22:43	8	Can you answer my question?
12:22:44	9	A Sure. You said does she have a email?
12:22:46	10	Q Yeah.
12:22:47	11	A Yeah. There's a lot of people that have
12:22:48	12	emails.
12:22:49	13	Q Okay. So
12:22:50	14	A That aren't employees.
12:22:51	15	Q So I could technically today get an email
12:22:53	16	account that says marie@unitethepeople.org?
12:22:58	17	A Uh-huh. If you do volunteer work with the
12:22:59	18	city, absolutely. Anything you do for the community,
12:23:01	19	you can get an email.
12:23:03	20	Q Okay. So how many people have
12:23:05	21	@unitethepeople.org email addresses?
12:23:07	22	A At least a 100.
12:23:08	23	Q At least a 100. Okay.
12:23:10	24	So Jaz Jamison is she paid by Unite the
12:23:15	25	People?

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CEASAR MCDOWELL JULY 25, 2025

12:23:16	1	A	Never.
12:23:16	2	Q	Are any of your employees paid by Unite the
12:23:18	3	People?	
12:23:18	4	A	Yes.
12:23:19	5	Q	Who?
12:23:20	6	A	The employees.
12:23:21	7	Q	Which ones?
12:23:23	8	A	I don't know.
12:23:26	9	Q	Okay. So are you saying Jazmyne Jamison is
12:23:29	10	not an em	ployee of Unite the People?
12:23:34	11	A	Define "employee." Is employee what? Give me
12:23:36	12	a definit	ion of employee.
12:23:38	13	Q	What does "employee" mean to you?
12:23:40	14	A	Somebody that I pay.
12:23:42	15	Q	Okay. Is Jazmyne Jamison someone you have
12:23:45	16	ever paid	1?
12:23:46	17	A	Nope. Nope.
12:23:47	18	Q	You or UTP have never cut
12:23:51	19	A	Never.
12:23:51	20	Q	a single check to Jaz Jamison?
12:23:53	21	A	Never once.
12:23:54	22	Q	Okay. So she is simply in charge of your
12:23:56	23	social me	edia?
12:23:57	24	A	I didn't say she was in charge.
12:23:59	25	Q	Okay.

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CEASAR MCDOWELL JULY 25, 2025

12:23:59	1	A I said she may have helped us with social
12:24:01	2	media.
12:24:02	3	Q Okay. So why were you forwarding these
12:24:04	4	documents?
12:24:04	5	A I didn't say I forwarded them.
12:24:06	6	Q The document
12:24:07	7	A I said I didn't remember.
12:24:08	8	Q Right. The document says you forwarded it.
12:24:09	9	So why would you have been forwarding material
12:24:12	10	to someone who is an agent of your organization with
12:24:18	11	your organization's email address? Why did you forward
12:24:22	12	it to them?
12:24:25	13	A Are you done?
12:24:27	14	Q Yes.
12:24:28	15	A Okay. I don't remember.
12:24:29	16	Q You don't remember.
12:24:41	17	The purpose of Jazmyne forwarding your email
12:24:43	18	to Ms. Cooper was so that Ms. Cooper could post it to
12:24:47	19	her social media account; correct?
12:24:49	20	A I don't remember.
12:24:49	21	Q Tory wanted the public to know about these
12:24:52	22	court filings; correct?
12:24:53	23	MR. HAYDEN: Objection. Speculation.
12:24:55	24	THE WITNESS: I don't remember.
12:24:55	25	BY MS. HAYRAPETIAN:

12:24:56	1	Q UTP was helping Tory get the information to
12:24:59	2	Ms. Cooper so she could share it publicly; correct?
12:25:02	3	MR. HAYDEN: Objection. Speculation.
12:25:04	4	THE WITNESS: I don't remember.
12:25:04	5	BY MS. HAYRAPETIAN:
12:25:05	6	Q This wasn't Ms. Cooper's idea. This came from
12:25:10	7	Tory through UTP; correct?
12:25:11	8	MR. HAYDEN: Same objection.
12:25:13	9	THE WITNESS: I don't remember.
12:25:13	10	BY MS. HAYRAPETIAN:
12:25:14	11	Q Do you know if Ms. Cooper requested this
12:25:18	12	information?
12:25:21	13	A I don't remember.
12:25:22	14	Q These emails the three emails we looked at
12:25:27	15	are not the only information that UTP passed on from
12:25:29	16	Tory to Ms. Cooper; correct?
12:25:32	17	MR. HAYDEN: Objection. Speculation.
12:25:33	18	Assuming facts not in evidence.
12:25:36	19	THE WITNESS: I don't remember.
12:25:36	20	BY MS. HAYRAPETIAN:
12:25:43	21	Q In fact, between July 2020 after the shooting,
12:25:47	22	and up until recently when UTP represented Ms. Cooper,
12:25:56	23	UTP passed on multiple piece of information from Tory to
12:25:57	24	Ms. Cooper; correct?
12:26:00	25	MR. HAYDEN: Objection. Speculation.

12:26:01	1	THE WITNESS: I don't remember.
12:26:02	2	BY MS. HAYRAPETIAN:
12:26:02	3	Q Some of that information that was passed to
12:26:07	4	Ms. Cooper was about Ms. Pete; correct?
12:26:12	5	A I don't recall.
12:26:13	6	Q Some of that information that was passed to
12:26:15	7	Ms. Cooper was about Tory's criminal case; correct?
12:26:20	8	A I don't remember.
12:26:22	9	Q UTP passed on information that Tory wanted
12:26:24	10	Ms. Cooper to share publicly; correct?
12:26:26	11	MR. HAYDEN: Objection. Speculation.
12:26:29	12	THE WITNESS: I don't remember.
12:26:29	13	BY MS. HAYRAPETIAN:
12:26:30	14	Q UTP passed on Tory's messages about whether
12:26:33	15	Ms. Pete was telling the truth at his trial; correct?
12:26:37	16	A I don't remember.
12:26:39	17	Q UTP relayed Tory's position that Ms. Pete lied
12:26:42	18	when she testified he shot her; correct?
12:26:47	19	A I don't remember.
12:26:47	20	Q Ms. Cooper herself has admitted, during her
12:26:51	21	live streams, that she received information from and
12:26:55	22	about Tory through UTP well before the start of this
12:26:59	23	lawsuit; correct?
12:27:01	24	A That was a lot. I didn't hear you say she
12:27:03	25	about Beegle Beagle? Who?

12:27:08 2 A I said it was a lot. And I said I was try 12:27:10 3 to hear you. I didn't or what I heard was Spider 12:27:13 4 Q Sure. Of course. Let me repeat my questi 12:27:15 5 Ms. Cooper herself has admitted, during he 12:27:19 6 live streams, that she received information from and 12:27:24 7 about Tory through UTP; correct? 12:27:29 8 A I don't remember. You should ask her.	man.
12:27:13 4 Q Sure. Of course. Let me repeat my question 12:27:15 5 Ms. Cooper herself has admitted, during her 12:27:19 6 live streams, that she received information from and 12:27:24 7 about Tory through UTP; correct?	on.
12:27:15 5 Ms. Cooper herself has admitted, during her lateral live streams, that she received information from and lateral la	r
12:27:19 6 live streams, that she received information from and about Tory through UTP; correct?	
12:27:24 7 about Tory through UTP; correct?	
12:27:29 8 A I don't remember. You should ask her.	
	I
12:27:36 9 MS. HAYRAPETIAN: Could we please mark as	
12:27:38 10 Exhibit 22-A, which would be the video, and then 22-	В
12:27:49 11 which would be the corresponding transcript, and I'm	Ĺ
12:27:53 12 looking to pull up Tab 31-A and B.	
12:28:01 13 STENO TECH: Just a moment. Can you give	that
12:28:03 14 to me again, please?	
12:28:05 15 MS. HAYRAPETIAN: Could you please pull up	i
12:28:07 16 Tab 31-A.	
12:28:14 17 STENO TECH: So you want just the Tab 31-A	<b>L</b>
12:28:15 18 pulled up first.	
12:28:16	
12:28:16 20 MS. HAYRAPETIAN: 22. And this would be E	· ,
12:28:16 21 and the video were about to listen to would be A.	
12:28:50 22 Sorry. Tab 82, not 22 exhibit sorry	·
12:28:52 23 Exhibit 82-B and Tab 31.	
12:29:00 24 STENO TECH: Give me just a moment. Okay.	
12:29:12 25 You need which exhibit pulled up?	

12:29:14	1	MS. HAYRAPETIAN: I need Tab 31-A pulled up as
12:29:18	2	Exhibit 82.
12:29:19	3	STENO TECH: Okay. I just pulled it. And I
12:29:20	4	have to share screen because it's a video.
12:29:23	5	Is this the video that you need right here?
12:29:26	6	MS. HAYRAPETIAN: Yes.
12:29:26	7	STENO TECH: Okay.
12:29:29	8	MS. DIXON: Was there an 81?
12:29:31	9	MS. HAYRAPETIAN: Yeah. 81 was the
12:29:32	10	August 4, 2024, email from Unite the People to
12:29:35	11	Milagro Gramz.
12:29:39	12	STENO TECH: Let me know when you need me to
12:29:40	13	play.
12:29:41	14	MS. HAYRAPETIAN: We are ready to play.
12:29:42	15	(A video clip was played.)
12:30:12	16	STENO TECH: Is that is it?
12:30:12	17	MS. HAYRAPETIAN: Yeah, that's good. Thank
12:30:13	18	you.
12:30:14	19	(Exhibit 82-A was marked for identification.)
12:30:14	20	(Exhibit 82-B was marked for identification.)
12:30:14	21	BY MS. HAYRAPETIAN:
12:30:15	22	Q So, on her July 5th, 2024, livestream,
12:30:17	23	Ms. Cooper stated, "Let me actually pull up Unite the
12:30:21	24	People's page because when anything happens with him,
12:30:24	25	this is who you are going to hear from, and then

12:30:27	1	obviously, I'm in contact with them; so you know I can
12:30:30	2	get information from them."
12:30:35	3	Ms. Cooper explicitly mentioned she was in
12:30:38	4	contact with UTP to get information from and about Tory;
12:30:45	5	correct?
12:30:47	6	A Are you asking me?
12:30:48	7	Q Yeah.
12:30:48	8	A I don't see that. What I see is where she
12:30:50	9	says she can get information about him.
12:30:52	10	Who is "him"? Are we assuming it's him, or
12:30:55	11	are we assuming it's somebody else?
12:30:57	12	Q Are you
12:30:59	13	A I'm just telling you what I'm reading.
12:31:01	14	Q Sure.
12:31:01	15	A You said about Tory. I don't see Tory's name
12:31:03	16	in there. I see about him. I don't know; so I'm going
12:31:06	17	to answer no. It looks like to me she's talking about
12:31:09	18	him.
12:31:10	19	Q Okay. What other clients do you have that you
12:31:14	20	give information to Ms. Cooper?
12:31:18	21	A I don't know. I don't remember.
12:31:21	22	Q Anyone other than Tory that is your client
12:31:24	23	that Ms. Cooper could be talking about?
12:31:27	24	A I don't remember.
12:31:51	25	Q UTP made sure that Ms. Cooper had access to

12:31:54	1	inside information regarding Tory's case so she could
12:31:56	2	continue to spin positive narratives about Tory;
12:31:59	3	correct?
12:31:59	4	MR. HAYDEN: Objection. Speculation.
12:32:02	5	MS. DIXON: Objection. Also compound. Vague
12:32:03	6	and ambiguous.
12:32:09	7	THE WITNESS: I don't remember.
12:32:10	8	BY MS. HAYRAPETIAN:
12:32:10	9	Q Okay.
12:32:16	10	MS. HAYRAPETIAN: Can we please pull up
12:32:17	11	Tab 32. They will be Exhibit 82. The transcript will
12:32:45	12	be B, and the video will be A.
12:33:03	13	Can we pull up the video, please, which is
12:33:05	14	Tab A.
12:33:15	15	STENO TECH: I cannot share both at the same
12:33:16	16	time.
12:33:16	17	MS. HAYRAPETIAN: We do not need to pull up
12:33:18	18	the transcript, unless I ask.
12:33:33	19	STENO TECH: You want 32-A?
12:33:36	20	MS. HAYRAPETIAN: Yes, please.
12:33:47	21	(A video clip was played.)
12:34:18	22	STENO TECH: Sorry it's taken so long. The
12:34:20	23	exhibits are not in person.
12:34:24	24	MS. HAYRAPETIAN: Do we need to go off the
12:34:26	25	record?

12:34:26	1	STENO TECH: (Indiscernible.)
12:34:32	2	MS. HAYRAPETIAN: What did she say?
12:34:36	3	STENO TECH: Okay. Yes. Go off the record
12:34:37	4	and give me a moment. Because I am yes.
12:34:40	5	THE VIDEOGRAPHER: The time is 12:34 PM
12:34:42	6	Pacific time. We are now off the record.
12:34:44	7	(Recess was taken.)
12:35:29	8	THE VIDEOGRAPHER: The time is 12:35 PM
12:35:37	9	Pacific time. We are back on the record.
12:35:47	10	MS. HAYRAPETIAN: Are we ready to play the
12:35:48	11	video?
12:35:50	12	(A video clip was played.)
12:36:24	13	BY MS. HAYRAPETIAN:
12:36:24	14	Q Were you able to look at the screen with Megan
12:36:27	15	Thee Stallion in the background?
12:36:29	16	A Who?
12:36:30	17	Q Megan Thee Stallion playing in the background?
12:36:32	18	A Who is that? Who is Megan Thee Stallion?
12:36:35	19	Q You don't know who Megan Thee Stallion is?
12:36:37	20	A Huh-uh.
12:36:38	21	Q Do you know who Megan Pete is?
12:36:40	22	A Oh, yeah. That's the lady in this case.
12:36:41	23	Q Yes. So did you see the image of her while
12:36:44	24	Milagro Cooper was talking about you?
12:36:46	25	A No.

12:36:46	1	Q Okay. Can we play that video again, and can
12:36:49	2	you please look at the screen?
12:36:50	3	A Sure. Let's do it.
12:36:50	4	(A video clip was played.)
12:37:24	5	BY MS. HAYRAPETIAN:
12:37:25	6	Q Were you able to see the image of Ms. Pete?
12:37:27	7	A I see Nicki Minaj.
12:37:29	8	Q Well, that's what
12:37:30	9	A And I see the Glo GloRilla.
12:37:32	10	Q Okay. Well, did you see
12:37:34	11	A A stallion?
12:37:35	12	Q Did you see Ms. Pete
12:37:36	13	A Oh, yeah. I saw Ms. Pete.
12:37:38	14	Q during the video?
12:37:39	15	A Yeah.
12:37:40	16	Q Okay. Thank you.
12:37:43	17	So on her October 28th livestream,
12:37:44	18	Ms. Cooper declared "So we already talked about the writ
12:37:47	19	of habeas corpus, but the documents were released, and
12:37:49	20	so you can go to Unite the People and you can read it.
12:37:51	21	I will be contacting Ceasar so that we can talk to him
12:37:54	22	and go ahead and get some insight."
12:37:59	23	Ms. Cooper publicly admitted to her followers
12:38:02	24	that she had a direct line of access to you; correct?
12:38:05	25	A That's what she said, it looks like.

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12:38:10	1	Q You were communio	cating directly with
12:38:12	2	Ms. Cooper to share information	ation about Tory; correct?
12:38:15	3	A I don't remember	
12:38:16	4	Q At this time Ms.	Cooper was not a client of
12:38:18	5	UTP; correct?	
12:38:19	6	A I don't remember	
12:38:20	7	Q UTP primarily rep	presents criminal defendants;
12:38:32	8	correct?	
12:38:34	9	A I don't know.	
12:38:35	10	Q You don't know?	
12:38:36	11	A If they primarily	À.
12:38:38	12	Q As the CEO of Un:	ite the People, you don't know
12:38:41	13	what the primary caseload?	
12:38:44	14	A Uh-huh. No. No	
12:38:45	15	Q No.	
12:38:46	16	A Huh-uh.	
12:38:47	17	Q Okay. And you a	lso don't know your company's
12:38:50	18	mission?	
12:38:53	19	A My company's mis	sion?
12:38:54	20	MR. HAYDEN: Obje	ection. Asked and answered.
12:39:02	21	BY MS. HAYRAPETIAN:	
12:39:02	22	Q You don't? You	don't remember your company's
12:39:04	23	mission?	
12:39:05	24	A No.	
12:39:06	25	Q Most of UTP's cl	ients are currently or

12:39:16 2 A Oh, you are done? Was that a question or a  12:39:24 3 statement?  12:39:28 4 MS. HAYRAPETIAN: Could you read back my  12:39:29 5 question, please.  12:39:30 6 (The following record was read:  12:39:30 7 "QUESTION: Most of UTP's clients are  12:39:30 8 currently or formally incarcerated;  12:39:30 9 correct?")	:39:14 1
MS. HAYRAPETIAN: Could you read back my 12:39:29 5 question, please. 12:39:30 6 (The following record was read: 12:39:30 7 "QUESTION: Most of UTP's clients are 12:39:30 8 currently or formally incarcerated;	:39:16 2
12:39:29 5 question, please.  12:39:30 6 (The following record was read:  12:39:30 7 "QUESTION: Most of UTP's clients are  12:39:30 8 currently or formally incarcerated;	:39:24
12:39:30 6 (The following record was read: 12:39:30 7 "QUESTION: Most of UTP's clients are 12:39:30 8 currently or formally incarcerated;	:39:28 4
12:39:30 7 "QUESTION: Most of UTP's clients are currently or formally incarcerated;	:39:29 5
12:39:30 8 currently or formally incarcerated;	:39:30
	:39:30
12:39:30 9 correct?")	:39:30
	:39:30
12:39:39 10 THE WITNESS: I don't remember.	:39:39 10
12:39:39 11 BY MS. HAYRAPETIAN:	:39:39 11
12:39:40 12 Q Most of UTP's cases are in California;	:39:40 12
12:39:43 13 correct?	:39:43 13
12:39:47 14 A I don't remember.	:39:47 14
12:39:48 15 Q Do you does UTP have offices anywhere else?	:39:48 15
12:39:53 16 A I don't remember.	:39:53 16
12:39:53 17 Q As a CEO of your company, you do not know,	:39:53 17
12:39:58 18 sitting here today, whether there is a UTP anywhere	:39:58 18
12:40:03 19 outside of California?	:40:03 19
12:40:06 20 A I don't know that.	:40:06 20
12:40:07 21 Q Who would know that information at UTP?	:40:07 21
12:40:15 22 A I don't know. Probably you can Google it.	:40:15 22
12:40:18 23 Q Okay.	:40:18 23
12:40:18 24 A If there's a UTP in another state, you are	:40:18 24
12:40:20 25 saying?	:40:20 25

12:40:21	1	Q	Does your company
12:40:23	2	А	Oh, my company.
12:40:24	3	Q	Your company.
12:40:24	4	А	Okay.
12:40:25	5	Q	UTP.
12:40:26	6	А	Unite the People Inc.
12:40:27	7	Q	Unite the People.
12:40:27	8	А	No. No. We don't have an office outside the
12:40:31	9	state.	
12:40:31	10	Q	Okay. So you are limited to California?
12:40:35	11	А	I don't know.
12:40:36	12	Q	Okay. But you don't have offices outside of
12:40:38	13	the state	?
12:40:39	14	А	No, unite the People doesn't. UTP might.
12:40:42	15	Q	What's the difference between UTP and Unite
12:40:43	16	the Peopl	e?
12:40:46	17	А	There's probably UTPs somewhere.
12:40:48	18	Q	No. We established at the beginning of the
12:40:51	19	depositio	n that you
12:40:53	20	А	Uh-huh.
12:40:53	21	Q	that you understood
12:40:55	22	А	Uh-huh.
12:40:55	23	Q	Unite the People and UTP to be the same.
12:40:58	24		Do you recall?
12:40:59	25	А	Yeah.

12:41:00	1	Q	You said yes?
12:41:01	2	А	But your question to me right now was, is
12:41:02	3	there a UT	P outside of California? I don't know.
12:41:05	4	Google it.	
12:41:06	5	Q	Okay. Any time I say "UTP"
12:41:09	6	A	Uh-huh.
12:41:10	7	Q	I mean Unite the People.
12:41:12	8	А	You seem like you are getting aggressive with
12:41:14	9	me. Why?	
12:41:15	10	Q	I am clarifying something for you.
12:41:16	11	А	Okay. Seems aggressive.
12:41:17	12	Q	Which part of it seemed aggressive?
12:41:19	13	A	Your demeanor, your tone, your deliverance
12:41:21	14	it all see	ems aggressive.
12:41:24	15	Q	Okay. Well, you are misreading me.
12:41:26	16	A	Oh, okay.
12:41:27	17	Q	So any time, as I explained at the very start
12:41:29	18	of my depo	sition, and you agreed every time I say
12:41:36	19	Unite the	People or UTP, it means the same thing.
12:41:42	20		Do you understand?
12:41:48	21	A	Yes.
12:41:50	22	Q	Okay. Great. Glad we're on the same page.
12:41:54	23	А	We're not on the same page, but I understand.
12:41:56	24	Q	So does Unite the People, aka UTP, operate
12:42:04	25	outside of	California?

12:42:07	1	A Unite the People aka UTP. No.
12:42:10	2	Q UTP focus UTP most of UTP's work
12:42:17	3	involves post-conviction matters; correct?
12:42:20	4	MR. HAYDEN: Objection. Asked and answered.
12:42:22	5	THE WITNESS: I don't remember.
12:42:22	6	BY MS. HAYRAPETIAN:
12:42:23	7	Q As the CEO of Unite the People, you do not
12:42:28	8	know whether most of UTP's work involves post-conviction
12:42:33	9	matters?
12:42:34	10	A I don't remember.
12:42:35	11	Q Does a large amount of UTP's work involve
12:42:40	12	post-conviction matters?
12:42:42	13	A Yes.
12:42:45	14	Q UTP focuses on helping prisoners with appeals
12:42:49	15	and sentence reductions; correct?
12:42:53	16	A I don't remember.
12:42:56	17	Q Unite the People focuses on helping prisoners;
12:42:58	18	correct?
12:43:01	19	A Unite the People focuses on helping homeless.
12:43:03	20	Unite the People focuses on helping children. Unite the
12:43:06	21	People focuses on sober living homes. Unite the People
12:43:08	22	focuses on transitional housing. Unite the People
12:43:14	23	focuses on mentoringships [as heard].
12:43:15	24	Q What kind of mentorships do you guys focus on?
12:43:17	25	A At-risk youth.

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12:43:18	1	Q What does that mean?
12:43:21	2	A What does at-risk youth mean?
12:43:23	3	Q Yeah?
12:43:24	4	A It means youth that are at risk.
12:43:25	5	Q Of what?
12:43:27	6	A A lot. Anything that they're at risk of.
12:43:30	7	Q Like going to prison?
12:43:32	8	A Sure.
12:43:33	9	Q Anything else?
12:43:34	10	A Yeah.
12:43:35	11	Q What else?
12:43:36	12	A A lot of stuff. At-risk gangs, gang violence,
12:43:41	13	sexual abuse, domestic violence, drugs a lot of
12:43:46	14	things.
12:43:48	15	THE COURT REPORTER: Wait. I need you to slow
12:43:49	16	down.
12:43:49	17	THE WITNESS: Slow down? Yes, ma'am.
12:43:51	18	THE COURT REPORTER: Thank you.
12:43:51	19	THE WITNESS: All right.
12:43:51	20	BY MS. HAYRAPETIAN:
12:43:52	21	Q And what inspired you to seek out those kind
12:43:56	22	of cases?
12:44:01	23	A What kind of cases?
12:44:03	24	Q At youth risk?
12:44:04	25	A At risk.

12:44:05	1	Q	At-risk youth. Thank you. Sorry.
12:44:07	2	A	It's okay. I like helping people.
12:44:12	3	Q	Okay. Ms. Cooper was never incarcerated;
12:44:17	4	correct?	
12:44:18	5	А	I don't know.
12:44:20	6	Q	Ms. Cooper's case was a civil defamation
12:44:22	7	lawsuit,	not a criminal matter; correct?
12:44:24	8	А	I don't remember.
12:44:25	9	Q	You don't remember whether the case you took
12:44:28	10	on for Ms	. Cooper was
12:44:29	11	А	No, I did not.
12:44:30	12	Q	civil or criminal?
12:44:32	13	А	No, ma'am.
12:44:32	14	Q	Do you have a diagnosis on memory loss?
12:44:38	15		MS. DIXON: Objection. That's argumentative.
12:44:42	16		THE WITNESS: I don't remember.
12:44:42	17	BY MS. HA	YRAPETIAN:
12:44:42	18	Q	Have you ever seen a doctor to consult about
12:44:44	19	your memo	ry?
12:44:49	20	А	Probably so.
12:44:50	21	Q	And what did the doctor say?
12:44:53	22	А	Said I was 6 foot 1. I don't remember.
12:44:56	23	Q	Okay. And when did you seek doctor's care for
12:45:01	24	issues wi	th your memory?
12:45:04	25	А	I've seen a lot of doctors.

12:45:06	1	Q But which one did you see with regards to your
12:45:08	2	memory?
12:45:09	3	A A lot of them. I don't remember their names.
12:45:12	4	Q Okay. And why did you seek a doctor's
12:45:15	5	opinion?
12:45:18	6	A I don't remember.
12:45:19	7	Q Did they give you a diagnosis?
12:45:21	8	A I don't remember. It would be in my prison
12:45:24	9	file. You can check that.
12:45:28	10	Q What were you in prison for again?
12:45:30	11	A I don't remember.
12:45:31	12	Q Ms. Cooper's case was filed in federal court
12:45:42	13	in Florida, not California; correct?
12:45:44	14	A I don't remember.
12:45:45	15	Q This wasn't a post-conviction matter; correct?
12:45:49	16	A I don't remember.
12:45:49	17	Q Ms. Cooper doesn't fit UTP's typical client
12:45:54	18	profile, does she?
12:45:55	19	A I don't remember.
12:45:56	20	Q UTP doesn't normally take civil defamation
12:46:00	21	cases; correct?
12:46:02	22	A I don't remember.
12:46:03	23	Q UTP doesn't normally represent clients in
12:46:06	24	Florida in federal court; correct?
12:46:14	25	A I don't remember.

12:46:16 2 non-incarcerated clients; correct?  12:46:20 3 A I don't remember.  12:46:21 4 Q So why did UTP make an exception for  12:46:25 5 Ms. Cooper?  12:46:30 6 A I'm sure they didn't.  12:46:31 7 Q What do you mean?  12:46:32 8 A Your prior question. Your prior question was  12:46:35 9 what again? Do we have clients out of prison?  12:46:40 10 Q My prior question was, so why did UTP make an  12:46:43 11 exception for Ms. Cooper?  12:46:44 12 A Oh, that was this one, not prior. That was  12:46:46 13 this one I don't remember.  12:46:48 14 Q Okay.  12:46:50 15 A I tried to help you.  12:46:50 16 Q One reason UTP made an exception and took on  12:46:50 17 Ms. Cooper's case was because of her connection to Tory;  12:46:59 18 Correct?  12:47:00 19 MR. HAYDEN: Objection. Speculation.
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12:46:56 17 Ms. Cooper's case was because of her connection to Tory; 12:46:59 18 correct?
12:46:59 18 correct?
12:47:00 19 MR. HAYDEN: Objection. Speculation.
12:47:01 20 THE WITNESS: I don't remember.
12:47:01 21 BY MR. MCLYMONT:
12:47:02 22 Q Tory asked you to represent Ms. Cooper; right?
12:47:05 23 MR. HAYDEN: Objection. Speculation.
12:47:06 24 THE WITNESS: I don't remember.
12:47:06 25 BY MS. HAYRAPETIAN:

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12:47:07	1	Q	You couldn't say no to Tory's request; right?
12:47:14	2		MR. HAYDEN: Objection. Speculation. Asked
12:47:15	3	and answe	ered.
12:47:16	4		THE WITNESS: I don't remember.
12:47:16	5	BY MS. HA	AYRAPETIAN:
12:47:17	6	Q	You don't remember whether it happened?
12:47:24	7	A	I don't remember anything.
12:47:25	8		MR. HAYDEN: Objection. Assuming facts not in
12:47:26	9	evidence.	
12:47:26	10	BY MS. HA	AYRAPETIAN:
12:47:27	11	Q	Did you meet Tory in your childhood?
12:47:35	12	A	Are you talking to me?
12:47:36	13	Q	Uh-huh.
12:47:36	14	A	Did I meet him in my childhood?
12:47:39	15	Q	Yeah.
12:47:39	16	A	I don't remember.
12:47:40	17	Q	Were you an adult when you became friends with
12:47:42	18	Tory?	
12:47:43	19	A	I don't remember.
12:47:46	20	Q	Where did you meet Tory?
12:47:49	21	A	I don't remember.
12:47:50	22	Q	You understand that Ms. Pete sued Ms. Cooper
12:47:58	23	for defam	nation; correct?
12:47:59	24	A	Did she?
12:48:01	25	Q	You took on the case, right, as CEO of Unite
			l l

12:48:05	1	the People?
12:48:05	2	A I don't remember.
12:48:06	3	Q You don't remember taking on this case?
12:48:08	4	A No.
12:48:08	5	Q The lawsuit was filed on October 30th, 2024;
12:48:13	6	correct?
12:48:13	7	A Was it?
12:48:17	8	Q Do you recall?
12:48:17	9	A I don't remember.
12:48:18	10	Q And Ms. Cooper was being sued for statements
12:48:21	11	she made supporting Tory; correct?
12:48:25	12	A I don't remember.
12:48:26	13	Q The same day the lawsuit was filed, you spoke
12:48:33	14	to Tory about it; correct?
12:48:35	15	A I don't remember.
12:48:36	16	Q Tory told you he wanted UTP to represent
12:48:41	17	Ms. Cooper; correct?
12:48:42	18	MR. HAYDEN: Objection. Speculation. Asked
12:48:43	19	and answered. Assuming facts not in evidence.
12:48:45	20	THE WITNESS: I don't remember.
12:48:46	21	BY MS. HAYRAPETIAN:
12:48:47	22	Q This wasn't Ms. Cooper's idea, was it?
12:48:52	23	A I don't remember.
12:48:52	24	Q It was Tory's idea?
12:48:55	25	MR. HAYDEN: Objection. Speculation.

12:48:56	1	Assuming facts not in evidence.
12:48:58	2	THE WITNESS: I don't remember.
12:48:58	3	BY MS. HAYRAPETIAN:
12:48:59	4	Q So you already testified that you are
12:49:08	5	involved, and you are the CEO of UTP.
12:49:16	б	A Is that the question?
12:49:18	7	Q I'm I'm trying to finish.
12:49:20	8	A Oh, I didn't know. It sounded like you
12:49:22	9	stopped.
12:49:23	10	Q And you have involvement in bringing in cases,
12:49:26	11	right, as the CEO of the company?
12:49:29	12	A Can you repeat that? I didn't understand
12:49:31	13	that. The question seemed two-part.
12:49:34	14	Q Okay. As the CEO of Unite the People and
12:49:36	15	you are; right. That was a bad question.
12:49:38	16	As the CEO of Unite the People, you have the
12:49:42	17	ability to bring in cases to the company; correct?
12:49:48	18	A What do you mean "bring in cases"?
12:49:50	19	Q Suggest cases that Unite the People should
12:49:53	20	take on.
12:49:56	21	A I don't remember.
12:49:57	22	Q But you are not denying that as CEO you have
12:50:02	23	the power to do so?
12:50:04	24	A I don't remember.
12:50:05	25	Q Tory asked you to have UTP represent

12:50:13	1	Ms. Cooper; correct?
12:50:14	2	MR. HAYDEN: Objection. Asked and answered.
12:50:15	3	Speculation. Assuming facts not in evidence.
12:50:20	4	THE WITNESS: I don't remember.
12:50:21	5	MS. HAYRAPETIAN: And, actually, the question
12:50:23	6	wasn't answered. The witness has just been saying "I
12:50:26	7	don't remember" for the last several hours. And I think
12:50:29	8	everyone in this room knows that that is not a
12:50:32	9	legitimate answer; so
12:50:34	10	MR. HAYDEN: Speculation, not a question.
12:50:35	11	BY MS. HAYRAPETIAN:
12:50:36	12	Q Tory understood that Ms. Cooper was in legal
12:50:39	13	trouble; correct?
12:50:41	14	MR. HAYDEN: Objection. Speculation.
12:50:44	15	THE WITNESS: I don't know.
12:50:44	16	BY MS. HAYRAPETIAN:
12:50:45	17	Q Tory knew Ms. Cooper was being sued for
12:50:46	18	statements that supported him; correct?
12:50:48	19	MR. HAYDEN: Objection. Speculation.
12:50:50	20	THE WITNESS: I don't know.
12:50:50	21	BY MS. HAYRAPETIAN:
12:50:52	22	Q Tory felt Ms. Cooper deserved legal help
12:50:54	23	because she supported him; correct?
12:50:56	24	MR. HAYDEN: Objection. Speculation.
12:50:57	25	THE WITNESS: I don't know.

12:50:57	1	BY MS. HAYRAPETIAN:
12:50:58	2	Q That's why Tory directed you to represent her;
12:51:00	3	correct?
12:51:01	4	MR. HAYDEN: Objection. Speculation.
12:51:02	5	Assuming facts not in evidence.
12:51:04	6	THE WITNESS: I don't know.
12:51:05	7	BY MS. HAYRAPETIAN:
12:51:06	8	Q This lawsuit was filed against Ms. Cooper on
12:51:08	9	October 30, 2024. That same day, you spoke to Tory over
12:51:13	10	a recorded prison phone line about UTP's representation
12:51:16	11	of Ms. Cooper.
12:51:18	12	Do you recall?
12:51:18	13	MR. HAYDEN: Objection. Attorney-client
12:51:19	14	privilege.
12:51:20	15	Instruct the witness not to answer.
12:51:32	16	MS. HAYRAPETIAN: You're instructing the
12:51:34	17	witness not to answer on whether he had a conversation
12:51:36	18	or not?
12:51:37	19	MR. HAYDEN: It's a recorded call on a jail
12:51:38	20	phone. If it's if it's become public record, that's
12:51:40	21	one thing, but it's Tory Lanez is a client of Unite
12:51:43	22	the People. Ceasar McDowell is my client in this
12:51:48	23	capacity and part of the legal team of Unite the People.
12:51:51	24	That is a special limited circumstance where I can
12:51:54	25	request the witness not to answer the question that

12:51:57	1	would incriminate himself or one of our clients.
12:52:00	2	MS. HAYRAPETIAN: So, first of all, I disagree
12:52:04	3	with that statement, but I am simply, at this point, not
12:52:11	4	asking about the substance of the conversation.
12:52:14	5	I am merely asking whether a conversation
12:52:16	6	occurred on a specific day between specific people, and
12:52:21	7	I am entitled to that information, even if it were to be
12:52:24	8	privileged, because that is the exact type of
12:52:27	9	information that would go on a privilege log.
12:52:31	10	So the instruction is, one, improper; but,
12:52:35	11	two, this is you cannot claim privilege. The witness
12:52:41	12	has already testified he had no power or involvement in
12:52:47	13	the legal part of UTP. And these prison records have
12:52:53	14	been produced in this litigation many, many, many months
12:52:57	15	ago.
12:52:58	16	And if you had an objection, it has already
12:53:01	17	been waived; so
12:53:05	18	MR. HAYDEN: He can answer to knowledge of the
12:53:07	19	conversation.
12:53:16	20	MS. HAYRAPETIAN: Can you read back my
12:53:17	21	question.
12:53:17	22	(The following record was read:
12:53:17	23	"QUESTION: That's why Tory directed you
12:53:17	24	to represent her; correct?")
12:53:17	25	THE COURT REPORTER: Or sorry. It's the

12:53:17	1	next one.
12:53:17	2	(The following record was read:
12:53:17	3	"QUESTION: This lawsuit was filed against
12:53:17	4	Ms. Cooper on October 30, 2024. That same
12:53:17	5	day, you spoke to Tory over a recorded
12:53:17	6	prison phone line about UTP's
12:53:17	7	representation of Ms. Cooper. Do you
12:53:17	8	recall?")
12:53:52	9	THE WITNESS: I don't remember.
12:53:54	10	MS. HAYRAPETIAN: Okay.
12:53:55	11	And also only communications where legal
12:53:57	12	advice is sought or received are protected under
12:54:01	13	attorney-client privilege.
12:54:05	14	But let's pull up as Exhibit 84. I'm looking
12:54:10	15	for Tab A Tab 9-A, please.
12:54:51	16	STENO TECH: Do you want me to play it?
12:54:52	17	MS. HAYRAPETIAN: Yes, please.
12:54:53	18	(A video clip was played.)
12:55:20	19	MS. HAYRAPETIAN: It's fine. We can hear it.
12:55:22	20	STENO TECH: Oh, okay. I can't hear it. No
12:55:23	21	worries.
12:55:23	22	MS. HAYRAPETIAN: Just let it play. We can
12:55:24	23	hear it fine.
12:55:27	24	STENO TECH: Sorry.
12:55:27	25	MS. HAYRAPETIAN: Thank you.

12:56:04	1	(A video clip was played.)
01:07:45	2	MS. HAYRAPETIAN: Okay. We can turn off the
01:07:45	3	recording. Thank you.
01:07:45	4	(Exhibit 84-A was marked for identification.)
01:07:45	5	(Exhibit 84-B was marked for identification.)
01:07:47	6	BY MS. HAYRAPETIAN:
01:07:49	7	Q So, on this October 30th call, you read Tory
01:07:58	8	a press release that UTP would issue the next day;
01:08:00	9	correct?
01:08:02	10	A Sound like it.
01:08:02	11	Q You said to Tory, quote, "Let me read it to
01:08:06	12	you. So it says Unite the People Inc. agrees to
01:08:09	13	represent this is the media release for tomorrow. Unite
01:08:13	14	the People Inc. agrees to represent Milagro Cooper
01:08:16	15	against threats and intimidation targeting influencers
01:08:20	16	for expressing their opinions in the civil matter filed
01:08:23	17	by the now-Claimant Megan Pete"; correct?
01:08:29	18	A I don't remember exactly all that was said,
01:08:30	19	but it sound like it.
01:08:33	20	Q Okay. And if you need to refer back to the
01:08:37	21	certified transcript in front of you, please do so.
01:08:39	22	It's on page 7, starting at lines 23 to 25; and page 8,
01:08:45	23	lines 1 to 5.
01:08:49	24	You were asking for Tory's approval of that
01:08:51	25	press release, weren't you?

01:08:55	1	MR. HAYDEN: Speculation.
01:08:58	2	THE WITNESS: Didn't sound like it to me.
01:08:59	3	BY MS. HAYRAPETIAN:
01:08:59	4	Q Okay. So what were you doing?
01:09:01	5	A I don't remember what I was doing, but what
01:09:02	6	you just played, it didn't sound like I was asking
01:09:05	7	anybody for approval.
01:09:06	8	Q Okay. So what were you doing reading him
01:09:10	9	A I just answered. I don't remember, but it
01:09:12	10	don't sound like I was asking anybody's approval.
01:09:14	11	Q Okay. So you don't remember why you were
01:09:16	12	reading it, but you know it wasn't for his approval?
01:09:18	13	A Not from what it just sounded like from what
01:09:21	14	you played.
01:09:21	15	Q Okay. So what did it sound like to you?
01:09:23	16	A It sound like two guys talking.
01:09:26	17	Q About what?
01:09:27	18	A I don't remember.
01:09:28	19	Q Why are you telling him about the press
01:09:30	20	release?
01:09:31	21	A I don't remember why.
01:09:32	22	Q You don't remember why you were telling
01:09:34	23	Tory Lanez about Milagro Cooper's press release on Unite
01:09:38	24	the People?
01:09:38	25	A I don't know why.

01:09:39	1	Q Okay. But you know it wasn't to seek his
01:09:41	2	approval I'm asking a question.
01:09:46	3	MS. DIXON: It wasn't her press release,
01:09:47	4	that's all I'm saying.
01:09:49	5	MS. HAYRAPETIAN: Okay.
01:09:52	6	MS. DIXON: Just for point of clarification of
01:09:53	7	the question.
01:09:53	8	BY MS. HAYRAPETIAN:
01:09:54	9	Q The press release about Ms. Cooper that you
01:09:59	10	are telling Tory about; right? You don't remember why
01:10:04	11	you were telling him; correct?
01:10:06	12	A I don't remember.
01:10:07	13	Q Okay. But you remember that you weren't
01:10:09	14	seeking his opinion; correct?
01:10:11	15	A No, I don't remember. What I just heard
01:10:14	16	didn't sound like somebody that was asking for
01:10:18	17	direction.
01:10:26	18	Q But you needed Tory's approval for a press
01:10:27	19	release before representing Ms. Cooper; right?
01:10:30	20	MR. HAYDEN: Objection. Speculation.
01:10:31	21	THE WITNESS: I don't remember.
01:10:31	22	BY MS. HAYRAPETIAN:
01:10:32	23	Q Before this call, had Tory asked you to
01:10:35	24	represent Ms. Cooper?
01:10:38	25	A I don't remember.

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CEASAR MCDOWELL JULY 25, 2025

01:10:39	1	Q You wouldn't have represented Ms. Cooper
01:10:42	2	without Tory's direction, would you?
01:10:44	3	MR. HAYDEN: Objection. Speculation.
01:10:46	4	THE WITNESS: I don't remember.
01:10:46	5	BY MS. HAYRAPETIAN:
01:10:47	6	Q And you met Ms. Cooper at Tory's trial; right?
01:10:53	7	MS. DIXON: Objection. Asked and answered.
01:10:57	8	THE WITNESS: I don't remember.
01:10:57	9	BY MS. HAYRAPETIAN:
01:10:59	10	Q Tory was the reason UTP took on Ms. Cooper's
01:11:02	11	case; correct?
01:11:04	12	MR. HAYDEN: Objection. Speculation.
01:11:07	13	THE WITNESS: I don't remember.
01:11:07	14	BY MS. HAYRAPETIAN:
01:11:08	15	Q You are providing him an update on how his
01:11:11	16	case is going; correct?
01:11:12	17	MR. HAYDEN: Objection. Speculation.
01:11:14	18	THE WITNESS: I don't remember.
01:11:14	19	BY MS. HAYRAPETIAN:
01:11:15	20	Q You then said to Tory, quote, "Unite the
01:11:19	21	People Inc. has agreed to take on the defense of
01:11:22	22	Milagro Cooper, as well as any other social media
01:11:25	23	influencer, journalism platform, journalist podcast, or
01:11:29	24	reporter of any type that has received this lawsuit
01:11:31	25	against them or any other form of bullying/harassment to

01:11:36	1	silence them from their right of freedom of speech."
01:11:42	2	You heard that; right?
01:11:44	3	A I heard that.
01:11:45	4	Q After UTP put out this media statement, did
01:11:48	5	any bloggers, podcasters, or social media personalities
01:11:52	6	reach out to UTP for legal advice or representation?
01:11:55	7	A I don't remember.
01:11:55	8	Q Do you currently have any cases other than
01:11:59	9	Ms. Cooper's?
01:12:01	10	A I don't remember.
01:12:03	11	Q So UTP has never represented any other social
01:12:10	12	media personalities other than Ms. Cooper?
01:12:13	13	A I don't remember.
01:12:14	14	Q Who would know at UTP?
01:12:21	15	A I don't know. I'd have to check.
01:12:22	16	Q Where would you have to check?
01:12:24	17	A At UTP.
01:12:25	18	Q Okay. So where would you go to find out the
01:12:31	19	information I'm asking you, if a judge was asking you?
01:12:35	20	A 555 East Ocean Boulevard, Suite 205,
01:12:38	21	Long Beach, California 90802. Unite the People
01:12:41	22	that's where I would go to ask.
01:12:43	23	Q Okay. And who would you ask at Unite the
01:12:44	24	People?
01:12:46	25	A I'd have to find out. I don't know who to

01:12:48	1	ask. I'd	have to ask them who to ask.
01:12:50	2	Q	So the CEO would have to ask
01:12:53	3	А	Who to ask.
01:12:53	4	Q	someone as CEO
01:12:55	5	А	That seems logical.
01:12:56	6	Q	at UTP
01:12:57	7	А	That sounds logical.
01:12:58	8	Q	who to ask. Okay.
01:13:00	9		And who would you ask?
01:13:02	10	А	I'd have to find out who to ask. I'd start
01:13:04	11	off by as	king, "Who do I ask."
01:13:05	12	Q	Okay. And who are you asking who do you ask?
01:13:07	13	A	I don't know.
01:13:08	14	Q	You don't know?
01:13:09	15	A	Huh-uh.
01:13:10	16	Q	So if we go to the judge in this case
01:13:16	17	A	Uh-huh. Let's go.
01:13:19	18	Q	who are you going to tell her has the
01:13:22	19	responses	to these questions since you don't know or you
01:13:25	20	don't rem	ember?
01:13:26	21	A	I don't know. Let's do it.
01:13:28	22	Q	Ms. Cooper is unique because of her special
01:13:37	23	relations	hip with Tory, right, and that's why you took
01:13:40	24	on her ca	se?
01:13:41	25		MR. HAYDEN: Objection. Speculation.

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CEASAR MCDOWELL JULY 25, 2025

01:13:42	1	THE WITNESS: She's unique?
01:13:42	2	BY MS. HAYRAPETIAN:
01:13:43	3	Q Yep.
01:13:43	4	A Is she? You said so, not me.
01:13:50	5	Q Tory asked you at what time UTP would post the
01:13:53	6	media statement. You responded, quote, "Probably first
01:13:57	7	thing in the morning. Indiscernible told me to post it
01:14:02	8	to my Instagram first, to the Unite the People
01:14:06	9	Instagram. And she said post it early, and then she'll
01:14:09	10	send it over to 'TMZ' and I guess whoever else. There's
01:14:12	11	a bunch of people. 'Rolling Stone'."
01:14:15	12	Do you recall hearing that just now?
01:14:19	13	A I heard something like that.
01:14:22	14	Q And who is the "she" you are referring to?
01:14:24	15	A I don't remember.
01:14:27	16	Q Are you referring to Ms. Mari Ronquillo?
01:14:30	17	A I don't remember.
01:14:30	18	Q Do you know who Ms. Mari Ronquillo is?
01:14:33	19	A I don't remember.
01:14:33	20	Q You don't remember if she is involved with
01:14:38	21	UTP?
01:14:43	22	A Do I remember if she's involved with Unite the
01:14:44	23	People.
01:14:44	24	Who is she?
01:14:45	25	Q I'm asking you. You don't know?

01:14:47	1	А	I I might I think I don't know.
01:14:51	2	Q	You might?
01:14:51	3	A	I don't recall right now.
01:14:52	4	Q	You don't recall right now?
01:14:53	5	A	Huh-uh.
01:14:54	6	Q	Okay. Is she an advisory member of UTP?
01:15:01	7	A	You would have to look at the website.
01:15:02	8	Q	I have. And I'm telling you, she is; so
01:15:04	9	A	Thank you. You answered your question.
01:15:07	10	Q	Okay. You agree, she is an advisory member of
01:15:09	11	UTP?	
01:15:10	12	A	No. I said you have to look at the website to
01:15:11	13	find ou	ıt.
01:15:12	14	Q	You've never heard her name?
01:15:16	15	A	I didn't say that.
01:15:18	16	Q	You've heard the name Ms. Mari Ronquillo?
01:15:24	17	A	I might have.
01:15:25	18	Q	You might have?
01:15:25	19	A	Yeah.
01:15:26	20	Q	Okay. Ms. Ronquillo is also the founder of
01:15:30	21	Lyme Li	te Media and public relations; correct?
01:15:33	22	A	I don't know.
01:15:33	23	Q	Lyme Lite helps artists and entertainers with
01:15:37	24	their p	public relations?
01:15:38	25	A	I don't know.

01:15:39	1	Q Ms. Ronquillo advises UTP on its press
01:15:42	2	releases and conferences; correct?
01:15:44	3	A I don't know.
01:15:45	4	Q Ms. Ronquillo also helps you with drafting
01:15:48	5	social media posts on UTP's account; correct?
01:15:50	6	A I don't know.
01:15:51	7	Q So who helps you with the social media posts
01:15:58	8	for UTP?
01:15:59	9	A I don't know.
01:16:01	10	THE WITNESS: Hey, do you have any Tylenol?
01:16:03	11	My tooth is starting to kill me. I don't know.
01:16:06	12	BY MS. HAYRAPETIAN:
01:16:06	13	Q Tory also asked you whether UTP would have a
01:16:09	14	conflict of interest in representing both him and
01:16:12	15	Ms. Cooper. Tory asked "Because she is saying I'm a
01:16:14	16	part of the board of advisory, so isn't that a conflict
01:16:18	17	of interest?"
01:16:20	18	You responded, quote, "The only conflict of
01:16:23	19	interest would be if Milagro didn't know we had
01:16:27	20	represented you. You dig what I'm saying?"
01:16:34	21	Do you recall listening to that just now?
01:16:37	22	A I recall hearing that.
01:16:39	23	Q Okay. So why is it not a conflict of
01:16:41	24	interest?
01:16:42	25	A I don't remember.

01:16:45	1	Q Why is it not a conflict of represent to
01:16:48	2	represent both Tory and Ms. Cooper?
01:16:52	3	MS. DIXON: Objection. Calls for a legal
01:16:53	4	opinion.
01:16:54	5	THE WITNESS: I don't remember.
01:16:54	6	BY MS. HAYRAPETIAN:
01:16:55	7	Q Okay. So what did you mean when you told
01:16:59	8	THE WITNESS: You don't have Advil? Nothing?
01:17:11	9	BY MS. HAYRAPETIAN:
01:17:11	10	Q And going back, I'm going to show you Exhibit
01:17:15	11	Number
01:17:24	12	MS. LEE: 85, I believe.
01:17:27	13	MS. DIXON: Can we go off the record for a
01:17:29	14	minute?
01:17:30	15	MS. HAYRAPETIAN: No. I'm not done
01:17:31	16	questioning.
01:17:32	17	MS. DIXON: We had an agreement that we were
01:17:33	18	going to go to lunch, and he said he had a headache.
01:17:36	19	MS. HAYRAPETIAN: Okay. Well, you don't
01:17:36	20	represent him; right?
01:17:37	21	MS. DIXON: It doesn't matter. You can't put
01:17:38	22	your hand in my face and tell me
01:17:40	23	(Multiple Simultaneous Speakers.)
01:17:40	24	MR. HAYDEN: Let's let's get through the
01:17:41	25	MS. HAYRAPETIAN: To be clear, my hand is in

01:17:43	1	no one's face. I am probably 10 feet away from opposing
01:17:45	2	counsel.
01:17:46	3	MS. DIXON: Well, don't put your hand up
01:17:47	4	anyway.
01:17:48	5	MS. HAYRAPETIAN: And I am in the middle of my
01:17:50	6	questioning, and I'm going to finish my questioning.
01:17:52	7	You continue to interrupt my questioning and everyone
01:17:54	8	else's questioning. And we're not going off the record
01:17:57	9	until I'm done with this part of my question.
01:18:01	10	BY MS. HAYRAPETIAN:
01:18:03	11	Q Okay.
01:18:05	12	THE WITNESS: Do they have a store around
01:18:07	13	here? I'm having a toothache that's going to my head,
01:18:09	14	like, it's real, real tough.
01:18:11	15	MR. HAYDEN: Let's get through this.
01:18:12	16	THE WITNESS: Can we speed it up or something?
01:18:13	17	Or I'm going to have to go get medication.
01:18:15	18	BY MS. HAYRAPETIAN:
01:18:16	19	Q Yes. UTP came out with a public statement
01:18:18	20	that it would represent Ms. Cooper on October 31st;
01:18:20	21	correct?
01:18:21	22	A I don't remember when.
01:18:23	23	Q Why do you need to update a different client
01:18:26	24	of yours, Tory, about UTP's representation of
01:18:29	25	Ms. Cooper?

	1	
01:18:32	1	A I don't remember.
01:18:34	2	Q You needed to update Tory because he
01:18:36	3	specifically asked you to represent Ms. Cooper; correct?
01:18:38	4	MR. HAYDEN: Objection. Speculation.
01:18:41	5	THE WITNESS: I don't remember.
01:18:42	6	BY MS. HAYRAPETIAN:
01:18:42	7	Q You couldn't say no to UTP's biggest client;
01:18:47	8	right?
01:18:48	9	MR. HAYDEN: Objection. Speculation. Asked
01:18:49	10	and answered.
01:18:54	11	BY MS. HAYRAPETIAN:
01:18:55	12	Q Right?
01:18:55	13	A Are you asking me that?
01:18:56	14	Q Yes.
01:18:56	15	A Who said he is my biggest client? You did? I
01:18:59	16	didn't say he was.
01:19:00	17	Q Okay. Who is your biggest client?
01:19:02	18	A I told you Allan McIntosh, I thought.
01:19:04	19	Q Okay. So one of UTP's biggest clients, you
01:19:07	20	couldn't say no to him; right Tory?
01:19:09	21	MR. HAYDEN: Objection. Asked and answered.
01:19:09	22	Speculation.
01:19:12	23	THE WITNESS: I don't remember.
01:19:13	24	BY MS. HAYRAPETIAN:
01:19:13	25	Q You couldn't say no to one of UTP's biggest

01:19:15	1	financiers; right?
01:19:17	2	MR. HAYDEN: Objection. Speculation.
01:19:18	3	THE WITNESS: I don't remember.
01:19:19	4	BY MS. HAYRAPETIAN:
	_	
01:19:20	5	Q You couldn't say no to UTP's biggest adviser;
01:19:23	6	right?
01:19:24	7	MR. HAYDEN: Objection. Speculation.
01:19:26	8	THE WITNESS: I don't remember.
01:19:26	9	BY MS. HAYRAPETIAN:
01:19:27	10	Q You needed to update Tory because he promised
01:19:30	11	to help pay for any fees and costs relating to
01:19:33	12	Ms. Cooper's defense; correct?
01:19:35	13	MR. HAYDEN: Objection. Speculation.
01:19:37	14	THE WITNESS: I don't remember.
01:19:37	15	BY MS. HAYRAPETIAN:
01:19:38	16	Q You needed to update Tory because he is
01:19:40	17	funding your organization; correct?
01:19:46	18	A I don't remember.
01:19:49	19	MS. HAYRAPETIAN: Let's go off the record and
01:19:50	20	take lunch.
01:19:51	21	THE VIDEOGRAPHER: The time is 1:19 PM
01:19:54	22	Pacific time. We are now off the record.
01:19:59	23	(Lunch break was taken.)
02:17:28	24	THE VIDEOGRAPHER: The time is 2:17 PM
02:17:30	25	Pacific time. We are back on the record.

02:17:33	1	MS. HAYRAPETIAN: Okay. Welcome back,
02:17:35	2	everyone. I have a quick correction to make. Oh,
02:17:38	3	there's an echo. Okay. Still an echo.
02:17:50	4	MS. DIXON: She has to mute this one, I think.
02:17:54	5	MS. HAYRAPETIAN: Okay. So maybe let's go off
02:17:57	6	the record.
02:17:57	7	Well, okay. That's better. Thank you.
02:18:06	8	Just wanted to make a quick correction. 84
02:18:10	9	Exhibit Number 84 is the video which is A, and 84-B is
02:18:16	10	the transcript.
02:18:18	11	And then I am going to add as Exhibit
02:18:25	12	Number 85 and if we can please pull up Tab 60-B
02:18:33	13	sorry 68
02:18:35	14	THE WITNESS: Can I ask a question on the
02:18:37	15	record, real fast?
02:18:37	16	MS. HAYRAPETIAN: Yes.
02:18:38	17	THE WITNESS: Do I I do receive copies of
02:18:39	18	these transcripts; correct?
02:18:41	19	MS. HAYRAPETIAN: Not to take home.
02:18:42	20	MR. HAYDEN: You can request them.
02:18:44	21	THE WITNESS: I can request them?
02:18:45	22	MS. HAYRAPETIAN: We can talk about it at the
02:18:46	23	end of the depo.
02:18:50	24	MS. DIXON: You get a copy to correct, but
02:18:51	25	it's online; correct?

02:18:52	1	MS. HAYRAPETIAN: I'll I'll do an
02:18:53	2	admonition at the end so we can cover questions.
02:18:59	3	STENO TECH: I cannot hear which exhibit you
02:19:01	4	said you needed.
02:19:02	5	MS. HAYRAPETIAN: 80 sorry 60-A.
02:19:04	6	STENO TECH: 60-A?
02:19:04	7	MS. HAYRAPETIAN: Uh-huh.
02:19:12	8	STENO TECH: And which exhibit is going to be
02:19:12	9	the which exhibit number I know it's 84-A and B,
02:19:16	10	but which exhibit number is actually the transcript?
02:19:17	11	Because there are quite a few here.
02:19:19	12	MS. HAYRAPETIAN: So on the transcript it will
02:19:21	13	reflect as 85-A, the video, which you are looking for
02:19:26	14	60-A, Tab 60-A. And the transcript will be 85-B.
02:19:47	15	And we're ready to play when you are.
02:19:48	16	And I will just clarify for Mr. McDowell
02:19:51	17	that this clip is the longer version of the excerpt from
02:20:00	18	Exhibit 82. So we pulled
02:20:07	19	STENO TECH: Ma'am, I don't have a 60. The
02:20:07	20	last number I have here is a 59-A and a 59-B. Then I
02:20:10	21	have a Tab 5, Tab 6, Tab 7, Tab 8, Tab 9-A. I do not
02:20:16	22	have a 60.
02:20:19	23	MS. HAYRAPETIAN: Gabby sent it to you on the
02:20:20	24	email.
02:20:26	25	Let's go off the record, please.

02:20:29	1	THE VIDEOGRAPHER: The time is 2:20
02:20:30	2	Pacific time. We are now off the record.
02:20:41	3	(Recess was taken.)
02:22:37	4	THE VIDEOGRAPHER: The time is 2:22 PM
02:22:46	5	Pacific time. We are back on the record.
02:22:40		
-	6	(A video clip was played.)
02:22:54	7	(Exhibit 85-A was marked for identification.)
02:22:54	8	(Exhibit 85-B was marked for identification.)
02:23:56	9	BY MS. HAYRAPETIAN:
02:23:56	10	Q Okay. So this is the extended version of
02:23:59	11	previously marked Exhibit 82 where Mr. McDowell had a
02:24:04	12	question as to who the "he" was.
02:24:07	13	And the subsequent paragraph is Ms. Cooper
02:24:13	14	talking about Mr. Daystar Peterson's filing; is that
02:24:17	15	correct?
02:24:19	16	A Huh?
02:24:22	17	Q The second paragraph
02:24:23	18	A Uh-huh.
02:24:24	19	Q on the transcript
02:24:25	20	A On this paper here?
02:24:26	21	Q Yes, correct. And the video we just heard.
02:24:29	22	A Oh, this one here?
02:24:30	23	Q No. That one.
02:24:34	24	A This one?
02:24:34	25	Q Yeah.

02:24:34	1	A	Okay.
02:24:34	2	Q	So the second paragraph, Ms. Cooper is talking
02:24:35	3	about Mr.	Peterson, correct, on the clip we just
02:24:39	4	heard?	
02:24:40	5	А	It sounded like it.
02:24:42	6	Q	Okay. So, going back to my question, you
02:24:45	7	said so	rry about that.
02:25:00	8		Okay. You know Sonstar Peterson, Tory's
02:25:04	9	father; co	rrect?
02:25:04	10	А	Who.
02:25:05	11	Q	Sonstar Peterson, Tory's father?
02:25:09	12	А	That's his name?
02:25:12	13	Q	You know him; right?
02:25:13	14	А	I his dad?
02:25:15	15	Q	Yes.
02:25:16	16	А	Oh, yeah. I know who his dad is.
02:25:19	17	Q	Okay. Sonstar has a close relationship with
02:25:21	18	Ms. Cooper	; correct?
02:25:22	19	А	I don't know nothing about any of that.
02:25:25	20	Q	Did Sonstar encourage you to represent
02:25:27	21	Ms. Cooper	?
02:25:29	22	А	I don't know nothing about none of that.
02:25:32	23	Q	Okay. Both Tory and his father wanted UTP to
02:25:36	24	represent	Ms. Cooper; right?
02:25:38	25	A	I know nothing about that.

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02:25:40	1	Q Did you know that Sonstar has referred to
02:25:43	2	Ms. Cooper as his daughter?
02:25:46	3	A I know nothing about that.
02:25:48	4	Q And Sonstar also testified under oath that he
02:25:53	5	flew Ms. Cooper out to Miami and visited Ms. Cooper in
02:25:56	6	Houston.
02:25:57	7	Do you know about that?
02:25:58	8	A Not at all.
02:25:59	9	Q Tory has been in prison since when, to your
02:26:04	10	knowledge?
02:26:05	11	A I don't know.
02:26:05	12	Q After the jury convicted Tory of shooting
02:26:09	13	Ms. Pete and while he was in prison, you and Tory
02:26:11	14	regularly spoke with one another; correct?
02:26:13	15	A I don't remember.
02:26:14	16	Q How many times have you spoken to Tory since
02:26:16	17	his incarceration?
02:26:18	18	A I couldn't possibly tell you.
02:26:20	19	Q Could you estimate?
02:26:20	20	A No.
02:26:21	21	Q Five times?
02:26:23	22	A More.
02:26:23	23	Q Ten?
02:26:27	24	A I don't remember.
02:26:27	25	Q Fifty?

02:26:29	1	А	I don't remember.
02:26:30	2	Q	Could it have been 50?
02:26:31	3	А	I can't recall.
02:26:32	4	Q	A hundred?
02:26:34	5	А	I don't remember.
02:26:35	6	Q	Okay. Is it also correct that sorry. Let
02:26:43	7	me go bac	k.
02:26:43	8		Would you say you've spoken to Tory at least
02:26:46	9	25 times	while he was in prison?
02:26:47	10	А	I don't recall.
02:26:48	11	Q	And how do you speak to Tory?
02:26:54	12	А	In English.
02:26:56	13	Q	Fair enough.
02:26:57	14		How do you speak to Tory while he is in
02:26:59	15	prison?	
02:27:00	16	А	In English.
02:27:01	17	Q	What mechanism do you use to speak to Tory?
02:27:03	18	А	My cell phone.
02:27:04	19	Q	Okay. And where do you call Tory?
02:27:07	20	А	Call Tory? He is in prison.
02:27:09	21	Q	Right. But what line do you call?
02:27:12	22	А	It varies.
02:27:14	23	Q	Is it a phone? Is it an iPad?
02:27:16	24	А	I thought I thought in prison they called
02:27:17	25	you?	

02:27:20 2  He calls you?  02:27:21 3  A I don't remember.  02:27:22 4  Q Okay. And you understand that at the prison of prison?  02:27:32 6  A I don't know what they're doing there.  02:27:35 7  02:27:36 8  A I don't know what they're doing there.  02:27:37 9  Q Okay. Tory used to call you from a device prison, right, on a recorded line?  02:27:42 10  Prison, right, on a recorded line?  02:27:47 12  Q Yes.  02:27:49 13  A Yeah. I think he used a phone to call me.  02:27:52 14  Q Okay. Did he ever use, like, an iPad or  02:27:54 15  A I've never been in there. I don't know. I don't know what they use.  Q Have you ever video called with Tory?  Q Yust an audio call?	
Q Okay. And you understand that at the prison occupied a dedicated device he could use to call people outside of prison?  A I don't know what they're doing there.  Q Okay. Tory used to call you from a device prison, right, on a recorded line?  A On the on the phone?  Q Yes.  A Yeah. I think he used a phone to call me.  Q Okay. Did he ever use, like, an iPad or tablet with a FaceTime feature?  A I've never been in there. I don't know. It don't know what I know of.	
Tory was at until he was stabbed, the facility gave he a dedicated device he could use to call people outside of prison?  O2:27:35 7 of prison?  O2:27:36 8 A I don't know what they're doing there.  O2:27:37 9 Q Okay. Tory used to call you from a device prison, right, on a recorded line?  O2:27:42 10 prison, right, on a recorded line?  O2:27:46 11 A On the on the phone?  O2:27:47 12 Q Yes.  O2:27:49 13 A Yeah. I think he used a phone to call me.  O2:27:52 14 Q Okay. Did he ever use, like, an iPad or  O2:27:54 15 tablet with a FaceTime feature?  O2:27:56 16 A I've never been in there. I don't know. I don't know what they use.  O2:27:59 18 Q Have you ever video called with Tory?  O2:28:01 19 A No, not that I know of.	
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02:27:59 18 Q Have you ever video called with Tory? 02:28:01 19 A No, not that I know of.	I
02:28:01 19 A No, not that I know of.	
02:28:02	
02:28:03 21 A Yeah. I don't remember anything.	
02:28:05 22 Q Okay. When Tory used that prison-dedicated	ed
02:28:12 23 device to speak with you, it would show up on your ph	hone
02:28:15 24 as being a device furnished by the prison; correct?	
02:28:18 25 A I don't know. I don't remember what it sai	id.

02:28:20	1	Q You don't know what number shows on your
02:28:22	2	caller ID when Tory calls?
02:28:24	3	A I wouldn't have remembered that.
02:28:25	4	Q Okay. But you remember hearing that the calls
02:28:27	5	are being monitored and recorded; right?
02:28:30	6	A I think they say something like that.
02:28:32	7	Q Okay. Kind of like the one we heard before
02:28:34	8	lunch; right? The long call we heard?
02:28:38	9	A Probably so.
02:28:38	10	Q Okay. It is also correct that, in addition to
02:28:41	11	the device the prison gave Tory as an inmate, Tory
02:28:46	12	acquired a separate phone to communicate with people
02:28:48	13	outside of prison; correct?
02:28:50	14	A I never heard anything about that.
02:28:51	15	Q Okay. So you've never called Tory on a
02:28:54	16	personal cell phone in prison?
02:28:55	17	A I don't remember anything.
02:28:57	18	Q You understand that this phone was not
02:29:02	19	authorized and considered a contraband phone; correct?
02:29:07	20	A Authorized by who?
02:29:08	21	MS. DIXON: Objection. Calls for speculation.
02:29:09	22	And assumes facts not in evidence.
02:29:11	23	BY MS. HAYRAPETIAN:
02:29:12	24	Q The prison.
02:29:15	25	A Say it again, I didn't hear you.

02:29:17	1	Q You understand that, if Tory has a phone he is
02:29:21	2	using in prison that was not given to him by the prison,
02:29:24	3	it is unauthorized; right?
02:29:28	4	A I don't know what they do.
02:29:29	5	Q Okay. In your experience 26 years in
02:29:34	6	prison, you said?
02:29:35	7	A Yes, ma'am.
02:29:37	8	Q Did people use contraband cell phones?
02:29:42	9	A I don't know. You'd have to ask the prison.
02:29:44	10	Q Okay. Tory used his contraband phone to
02:29:51	11	communicate with you; correct?
02:29:54	12	MR. HAYDEN: Objection. Speculation.
02:29:55	13	THE WITNESS: I know nothing about a
02:29:56	14	contraband cell phone.
02:29:57	15	BY MS. HAYRAPETIAN:
02:29:58	16	Q Tory has actually had more than one contraband
02:30:02	17	cell phone, right, while he has been in prison?
02:30:04	18	MR. HAYDEN: Objection. Speculation.
02:30:05	19	THE WITNESS: I don't know anything about
02:30:07	20	anything.
02:30:07	21	BY MS. HAYRAPETIAN:
02:30:08	22	Q So, if we consensually took a look at your
02:30:15	23	phone, would you have the phone numbers to Tory's
02:30:19	24	contraband phones saved in your phone book?
02:30:21	25	A He has contraband phones? Does he?

02:30:26	1	Q I don't know.
02:30:27	2	Does he?
02:30:28	3	A I've never heard of that.
02:30:30	4	Q You've never heard of that. Okay.
02:30:31	5	You didn't help him obtain a contraband cell
02:30:33	6	phone?
02:30:34	7	MR. HAYDEN: Objection. Speculation.
02:30:36	8	THE WITNESS: I don't know nothing about what
02:30:37	9	you are talking about. Help him obtain a I don't
02:30:39	10	know anything about that.
02:30:41	11	BY MS. HAYRAPETIAN:
02:30:41	12	Q It's a yes-or-no question.
02:30:42	13	MS. DIXON: Objection. Also it's a Fifth
02:30:44	14	Amendment violation. He doesn't have to answer because
02:30:46	15	it's his phone.
02:30:47	16	MS. HAYRAPETIAN: Oh. Are you his lawyer now?
02:30:50	17	MS. DIXON: I'm a lawyer, and I'm here.
02:30:52	18	MS. HAYRAPETIAN: But are you his lawyer?
02:30:54	19	MS. DIXON: I don't have to be his lawyer to
02:30:55	20	make an objection. I'm Milagro's lawyer. I'm here
02:30:58	21	appropriately.
02:30:59	22	MS. HAYRAPETIAN: Okay. So whose I'm just
02:30:59	23	curious, whose Fifth Amendment right are you invoking
02:31:02	24	over there?
02:31:04	25	MS. DIXON: I'm letting him know he can take

02:31:06	1	the Fifth Amendment, if he wants to.
02:31:07	2	MS. HAYRAPETIAN: Okay.
02:31:08	3	MR. HAYDEN: Object to speculation. Also add
02:31:10	4	Fifth Amendment.
02:31:11	5	MS. HAYRAPETIAN: Okay. So my understanding
02:31:13	6	is that Mr. McDowell is represented by
02:31:16	7	Mr. Michael Hayden from Unite the People. If that has
02:31:18	8	changed since the lunch break, please let me know, and
02:31:21	9	let's correct the appearances on the record.
02:31:23	10	MS. DIXON: Here is the problem: He was prior
02:31:25	11	counsel; so his team was prior counsel. That means that
02:31:29	12	as a successor in interest, I do have an interest in his
02:31:32	13	testimony, especially if it has anything to do with my
02:31:35	14	client. And that's why he is here because supposedly
02:31:37	15	it's relevant to your complaint.
02:31:40	16	MS. HAYRAPETIAN: Okay. So you are saying you
02:31:41	17	guys have a common interest agreement?
02:31:43	18	MS. DIXON: Yes. I don't have an agreement.
02:31:44	19	I just it's just obviously I don't have any
02:31:47	20	agreement with him, but I didn't say that.
02:31:54	21	BY MS. HAYRAPETIAN:
02:31:55	22	Q Do you know the PIN code to Tory's contraband
02:32:01	23	phones?
02:32:04	24	A I don't know anything what you are talking
02:32:05	25	about. I've never heard of a contraband phone.

```
1
                      Is your cell phone number
               Okay.
          Q
 2
     (562)
 3
          Α
               No.
 4
               What is your cell phone number?
          0
               I don't know.
                               That's not it. Call that
 5
     number right now. See if my phone rings. Let's do it
 6
     on video.
 7
               So what is your cell phone number?
 8
          0
 9
               I don't know. I don't know if I should give
          Α
10
     that out. That's kind of personal.
11
               Was this ever your cell phone number:
          Q
12
     (562)
                   ?
13
          Α
               Yes.
14
               When was it your cell phone number?
          0
               I don't remember.
15
          Α
16
               How many years do you think you had that
          0
17
     cell phone number for?
               I don't remember.
18
          Α
19
               Why did you change it?
          0
20
          Α
               I don't remember.
21
               Okay. Did you also get a new phone when you
          Q
22
     changed your number?
23
               Did I get who?
          Α
24
               A new phone when you changed your number?
          Q
25
               I don't remember what they did.
          Α
```

```
1
               MR. HAYDEN: Objection. Relevance.
 2
               MS. HAYRAPETIAN: Okay. I'm going to mark for
 3
     the record Exhibit 86, and I need Tab 42, please.
 4
               STENO TECH: Just a moment. Getting that
 5
     done.
                             This is nice paper.
 6
               THE WITNESS:
               MS. DIXON: What number is this one?
 7
               MS. HAYRAPETIAN: 86.
 8
 9
               MS. DIXON: 86?
                                Okay.
10
               STENO TECH: Let me know when you need me to
11
     scroll, ma'am.
12
               MS. HAYRAPETIAN: Stay here for just a second.
13
               (Exhibit 86 was marked for identification.)
14
     BY MS. HAYRAPETIAN:
15
               All right. So these are calls we -- this
16
     is -- first of all, this is a document we received from
17
     the prison in response to a subpoena request, and these
18
     are calls between you and Tory from October 2023 to
19
    December 2024.
20
               And looking on page 1, where it says
                                           number we
21
     destination number -- it's that (563)
22
     just discussed -- that was your prior phone number;
23
     correct?
24
         Α
               I don't know where you're at.
25
               Page 1. The first page.
          Q
```

1 Page 1 is what? Α 2 Let's look at page 1 --0 3 Sure. Α 4 -- where it says destination number. 0 like, the third line from the bottom. 5 From the bottom? Okay. 6 Α 7 Q And then it says the phone number we were just discussing as your prior phone number -- (562) 8 9 Okay. So there's 97 calls over 14 months. 10 And you can see that if you go to the last page where the total number of calls is listed. 11 12 Do you see that? 13 Α Sure. 14 Okay. So you talked to Tory about twice a 15 week for over a year; correct? 16 I don't remember. Α Luckily, we have it in front of us. 17 Q It's something. I don't know if that's me 18 19 talking to him. I don't see any pictures or anything 20 like that, but I do see a phone number there. 21 Q Right. So these are the records from the 22 prison of your phone number speaking with Tory Lanez 97 23 times over 14 months. 24 Α I don't know. 25 Q Okay.

```
1
               MS. HAYRAPETIAN: Let's mark as Exhibit 87,
 2
     Tab 16, please.
 3
               (Exhibit 87 was marked for identification.)
 4
     BY MS. HAYRAPETIAN:
 5
               So these are records AT&T in response to our
     subpoena of Ms. Milagro Cooper's cell phone, and these
 6
 7
     show 73 calls between you and Ms. Cooper from
     October 2024 to March '25.
 8
 9
               It shows what?
10
               73 calls between you and Ms. Cooper from
          0
11
     October 2024 to March 2025.
12
          Α
               Okay.
13
               And if you --
          Q
14
               I don't remember much, but that, for sure, is
15
     really weird.
16
               You said 90-something calls?
               No.
17
          Q
                    73.
               73 calls?
18
          Α
19
               Yeah. 97 were with Tory.
          0
20
          Α
               Wow.
21
               And that's, again, your number that we
          Q
22
     discussed -- (563)
               I got to say something. You guys made this
23
24
          Somebody made this up. There's no way in the world
25
     that I talked to her 73 times. That's impossible.
```

02:37:41	1	Q Well, these are the records we received from
02:37:43	2	AT&T.
02:37:45	3	A Somebody is lying.
02:37:46	4	Q Your counsel has had copies of these records
02:37:50	5	since they were produced by AT&T. And they have
02:37:53	6	A I hear what you are saying, but I'm telling
02:37:55	7	you, either AT&T or somebody in y'all camp is lying.
02:37:59	8	There's no way in the world I've talked to her 73 times.
02:38:02	9	It's impossible.
02:38:04	10	Q So why would AT&T lie?
02:38:06	11	A Or your guys's law firm. There's no way I've
02:38:09	12	talked to her 73 times. And we can go ahead and get
02:38:11	13	back to the questioning, but that's super false.
02:38:13	14	If I handed you a piece of paper and said you
02:38:16	15	called her 73 times, and you knew good and well you
02:38:19	16	ain't never called her 73 times, would you say
02:38:20	17	something?
02:38:21	18	Q So, let's actually stay here. I want to know
02:38:24	19	why you think someone at AT&T or our firm would have
02:38:27	20	fabricated this evidence.
02:38:28	21	A I don't know. But I know I ain't talking to
02:38:31	22	nobody no 73 times. I do know that, and I'll stand on
02:38:34	23	that.
02:38:34	24	Q Okay. But that is the number we discussed;
02:38:37	25	right? Originating number, right here, it says

```
1
     (562)
            ; right?
 2
          Α
               I see (281)
 3
               Well, that's where you the call goes.
          Q
 4
               It says originating number.
          Α
 5
          0
               Well, which number are you looking at?
               I'm looking right here, right on your list
 6
          Α
 7
     that says originating number.
 8
          Q
               Right.
 9
               And so let's see how many times this says.
10
     Maybe you looked at it wrong. Let's check your
11
     homework.
12
          0
               So --
13
               So hold on. If this says 73 -- if this says
14
     73, that means you are quoting it wrong. There it goes.
15
     So do your homework now. And your quoting it wrong.
16
          0
               Which part was wrong?
17
          Α
               Because where it says originating number, that
18
     is -- oh, the term.
19
               So you are saying that she called me back and
20
     forth?
21
               Uh-huh.
          Q
                        Correct.
22
               Not I called her those times.
          Α
23
               Correct. You guys spoke --
          0
24
          Α
               I still don't believe that.
25
               -- you guys spoke 73 times.
          Q
```

02:39:31	1	A	I still don't believe that. I still don't
02:39:31	2	believe th	nat but go ahead. We'll go ahead. I'm sorry
02:39:33	3	for inter	rupting.
02:39:33	4	Q	Okay. Apologies if I misstated
02:39:38	5	A	Sure.
02:39:38	6	Q	but, yes, it's 73 calls between you and
02:39:42	7	Ms. Cooper	· ·
02:39:43	8	A	I think still that's wrong.
02:39:44	9	Q	Okay. Well, this is the sheet we have from
02:39:47	10	AT&T.	
02:39:48	11	A	All right. Let's go.
02:39:49	12	Q	And our firm did not make it.
02:39:51	13	A	Are you sure?
02:39:52	14	Q	I'm positive.
02:39:53	15	A	How how are you sure?
02:39:54	16	Q	I'm positive.
02:39:55	17	A	Okay.
02:39:56	18	Q	Because these were in response
02:39:57	19	A	You watch everybody at your firm?
02:39:58	20	Q	This was in response to a subpoena response
02:40:01	21	that was p	produced to our firm
02:40:03	22	A	It's still wrong.
02:40:04	23	Q	and your lawyers.
02:40:06	24	A	Okay.
02:40:06	25	Q	Okay. So 97 calls with Tory. 73 calls with

00 40 10	_	
02:40:13	1	Ms. Cooper.
02:40:15	2	During this lawsuit, you talked to Ms. Cooper
02:40:18	3	weekly; correct?
02:40:19	4	A Not at all.
02:40:21	5	Q Okay. So let's focus on this October to
02:40:24	6	December 2024 period right after the lawsuit was filed.
02:40:28	7	During those two months, you spoke to Tory about 40
02:40:32	8	times based on these records. And during those same
02:40:38	9	two months, you spoke to Ms. Cooper 50 times.
02:40:43	10	MR. HAYDEN: Objection. Relevance.
02:40:45	11	BY MS. HAYRAPETIAN:
02:40:45	12	Q You were talking to both of them about
02:40:48	13	Ms. Pete during this period; correct?
02:40:51	14	MR. HAYDEN: Objection. Speculation.
02:40:52	15	THE WITNESS: Not at all.
02:40:52	16	BY MS. HAYRAPETIAN:
02:40:53	17	Q So in at least 50 calls, not once did you
02:40:57	18	discuss Megan Pete?
02:41:00	19	A I don't remember.
02:41:01	20	Q Are you telling me that in 50 calls with
02:41:07	21	Ms. Cooper you never once passed along information about
02:41:10	22	Ms. Pete from Tory?
02:41:13	23	MR. HAYDEN: Objection. Speculation.
02:41:14	24	THE WITNESS: I don't remember.
02:41:15	25	BY MS. HAYRAPETIAN:

02:41:15	1	Q You are saying you created a solid wall
02:41:21	2	between what Tory told you and what you told Ms. Cooper?
02:41:27	3	A I don't remember.
02:41:28	4	Q Okay. So when Tory gave you information about
02:41:32	5	Ms. Pete, that information just stopped with you?
02:41:34	6	MR. HAYDEN: Objection. Speculation.
02:41:36	7	THE WITNESS: I never said nobody gave me
02:41:38	8	information about nothing. I don't remember nothing
02:41:40	9	about what you are talking about.
02:41:42	10	BY MS. HAYRAPETIAN:
02:41:42	11	Q Did your conversations with Tory did the
02:41:52	12	subject of your conversations with Tory make its way to
02:41:55	13	Ms. Cooper through you?
02:41:59	14	A I don't know what you are talking about.
02:42:01	15	Q Did Tory
02:42:01	16	A I don't remember none of that. Nothing. I
02:42:04	17	don't remember none of that.
02:42:05	18	Q Okay. Did Tory ever tell you what he ate?
02:42:12	19	MR. HAYDEN: Objection. Relevance.
02:42:13	20	THE WITNESS: I don't remember.
02:42:19	21	MS. HAYRAPETIAN: Okay. Let's pull up
02:42:21	22	Tab 11-A and mark it as Exhibit 88-A, and I would also
02:42:26	23	like to mark the transcript of the recording as 88-B.
02:42:58	24	STENO TECH: What's the tab you need?
02:42:58	25	MS. HAYRAPETIAN: 11-A.

02:42:58	1	STENO TECH: 11-A. Okay. Thank you. I'm on
02:42:58	2	it.
02:42:58	3	THE WITNESS: I'm going to have to get out of
02:43:00	4	here in about 18 minutes.
02:43:02	5	MS. HAYRAPETIAN: What does that mean?
02:43:02	6	THE WITNESS: I have to leave in about
02:43:02	7	18 minutes.
02:43:02	8	MS. HAYRAPETIAN: Leave for where?
02:43:03	9	THE WITNESS: I have a family situation I got
02:43:04	10	to take care of.
02:43:06	11	MS. HAYRAPETIAN: Mr. Hayden?
02:43:07	12	MR. HAYDEN: Can we get off the record?
02:43:09	13	MS. HAYRAPETIAN: Actually, I would like this
02:43:10	14	conversation to stay on the record, if that's okay.
02:43:13	15	MR. HAYDEN: I would rather get through this
02:43:14	16	today, because we will be court-ordered to come back.
02:43:18	17	THE WITNESS: I hear you. It doesn't change
02:43:20	18	what I said, though. I still got something I got to
02:43:24	19	take care of; so we just come back Monday and hang out
02:43:26	20	again.
02:43:27	21	MS. HAYRAPETIAN: We actually cannot.
02:43:29	22	THE WITNESS: Well, if I got to leave 'cause
02:43:31	23	of a family situation, at at one point, it's going to
02:43:35	24	have to end.
02:43:38	25	MS. HAYRAPETIAN: And okay. Let's play the

02:43:47	1	recording, please.
02:43:48	2	(A video clip was played.)
02:44:12	3	THE WITNESS: Did you want me to play it?
02:44:17	4	MS. HAYRAPETIAN: Court Reporter sorry.
02:44:17	5	Ms. Thrash, can we play the recording?
02:44:21	6	STENO TECH: Yes, I was playing it.
02:44:23	7	You guys can't hear it?
02:44:24	8	MS. HAYRAPETIAN: No.
02:44:25	9	STENO TECH: Okay. Just a moment, please.
02:44:26	10	Let me see what's going on.
02:44:30	11	MR. HAYDEN: TV volume maybe.
02:44:31	12	MS. HAYRAPETIAN: No. It was working a second
02:44:33	13	ago.
02:45:00	14	THE WITNESS: You guys want my help?
02:45:01	15	MS. HAYRAPETIAN: No. It's fine. I'm I'm
02:45:02	16	just going to play it myself.
02:45:04	17	THE WITNESS: Okay.
02:45:06	18	(A video clip was played.)
02:45:10	19	STENO TECH: Can you hear it now?
02:45:12	20	MS. HAYRAPETIAN: Yes.
02:45:13	21	STENO TECH: Okay.
02:45:14	22	(A video clip was played.)
02:45:14	23	(Exhibit 88-A was marked for identification.)
02:45:14	24	(Exhibit 88-B was marked for identification.)
02:45:33	25	BY MS. HAYRAPETIAN:

02:45:33	1	Q So this is a November 15, 2023, phone call
02:45:36	2	between you and Tory. And he stated, "You've got the
02:45:41	3	Megan bitch trying to make it seem like, or the
02:45:44	4	Meghann Cuniff lady trying to make it seem like we don't
02:45:48	5	know what we're doing, which is fine. Because I love
02:45:50	6	being the underdogs. But I love being the underdog who
02:45:53	7	wins the race. And my thing is just, like, if this can
02:45:57	8	help us win the race, then let's use everything that we
02:46:00	9	can use to win the race."
02:46:02	10	What race is Tory talking about winning?
02:46:04	11	A I don't remember.
02:46:06	12	Q When Tory says, "let's use everything that we
02:46:08	13	can," what's he referring to?
02:46:10	14	A I don't remember.
02:46:11	15	Q When Tory says, "if this can help us," what's
02:46:14	16	"this"?
02:46:16	17	A I don't remember.
02:46:16	18	Q Who is Meghann Cuniff?
02:46:19	19	A I don't remember.
02:46:20	20	Q Meghann Cuniff was a journalist writing about
02:46:25	21	Tory's conviction; right?
02:46:27	22	A I don't remember.
02:46:27	23	Q And she was also writing about the testimony
02:46:29	24	Ms. Pete gave, including that Tory shot her; correct?
02:46:32	25	A I don't remember.

02:46:34	1	Q In this November 15, 2023, conversation with
02:46:37	2	Tory, you and Tory are talking about the public
02:46:40	3	relations strategy; correct?
02:46:41	4	A I don't remember.
02:46:42	5	Q When Tory was telling you about his desire to,
02:46:45	6	quote, "win the race," he was talking about his desire
02:46:48	7	to convince people he didn't shoot Ms. Pete; right?
02:46:51	8	A I don't remember.
02:46:51	9	Q In November 20 in this November 2023
02:46:54	10	conversation, you and Tory are talking about shaping the
02:46:57	11	public narrative about whether he shot Ms. Pete;
02:46:59	12	correct?
02:46:59	13	MR. HAYDEN: Objection. Speculation.
02:47:02	14	THE WITNESS: I don't remember.
02:47:02	15	BY MS. HAYRAPETIAN:
02:47:03	16	Q If that's not what you are talking about, then
02:47:05	17	what did Tory mean by "win the race"?
02:47:09	18	A I don't remember.
02:47:10	19	Q The plan was for Tory to give you information
02:47:12	20	that you would pass to Ms. Cooper for her social media;
02:47:15	21	correct?
02:47:15	22	MR. HAYDEN: Objection. Speculation.
02:47:17	23	THE WITNESS: I don't remember.
02:47:17	24	BY MS. HAYRAPETIAN:
02:47:18	25	Q In Tory's own words he was willing to, quote,

02:47:21	1	"use everything that he can use to win the race." That
02:47:26	2	is, to convince everyone that he didn't shoot Ms. Pete
02:47:28	3	correct?
02:47:29	4	MR. HAYDEN: Objection. Speculation.
02:47:30	5	THE WITNESS: I don't remember.
02:47:31	6	BY MS. HAYRAPETIAN:
02:47:32	7	Q To use everything to that end, Tory wanted
02:47:34	8	you to communicate information from him to Ms. Cooper to
02:47:36	9	share with her followers on social media; right?
02:47:39	10	MR. HAYDEN: Objection. Speculation.
02:47:40	11	THE WITNESS: I don't remember.
02:47:40	12	BY MS. HAYRAPETIAN:
02:47:41	13	Q And you were willing to do so; right?
02:47:43	14	MR. HAYDEN: Objection. Speculation.
02:47:44	15	THE WITNESS: I don't remember.
02:47:45	16	BY MS. HAYRAPETIAN:
02:47:45	17	Q And you did so; right?
02:47:46	18	MR. HAYDEN: Same objection.
02:47:48	19	THE WITNESS: I don't remember.
02:47:52	20	MS. HAYRAPETIAN: Okay. Let's mark as
02:47:53	21	Exhibit 89, Tab 38-A.
02:48:17	22	STENO TECH: Do you want me to play it?
02:48:19	23	MS. HAYRAPETIAN: Yes, please.
02:48:20	24	(A video clip was played.)
02:48:24	25	MS. DIXON: What number is this?

02:48:34	1	MS. HAYRAPETIAN: Can we please play 38-A?
02:48:37	2	STENO TECH: Yes, ma'am. I'm coming. Yes,
02:48:38	3	ma'am. Give me just a moment, please.
02:48:39	4	MS. HAYRAPETIAN: Thank you.
02:48:45	5	STENO TECH: It just downloading.
02:49:25	6	(A video clip was played.)
02:49:25	7	(Exhibit 89-A was marked for identification.)
02:49:25	8	(Exhibit 89-B was marked for identification.)
02:49:28	9	BY MS. HAYRAPETIAN:
02:49:29	10	Q So, on December 17, 2023, you had a phone call
02:49:30	11	with Tory, during which you discussed both Ms. Cooper
02:49:32	12	and Ms. Pete.
02:49:33	13	Tory said, quote, "The only name she was just
02:49:36	14	a fucking, just a fucking, was just a girl coming on
02:49:39	15	Instagram Live."
02:49:41	16	You responded, "Oh, with, I forgot that girl's
02:49:45	17	name, the it was the Milagro one. You talking about
02:49:47	18	that one?"
02:49:48	19	Then Tory exclaimed, "No. I'm talking about
02:49:50	20	the girl, the girl from the whole case. Like Megan, I'm
02:49:54	21	talking about her."
02:49:55	22	When Tory said, "girl coming on Instagram
02:49:58	23	Live," you immediately thought it was Ms. Cooper; right?
02:50:02	24	A I don't remember.
02:50:03	25	Q Well, you just heard your voice, and your

02:50:07	1	immediate reaction was "it was the Milagro one"; right?
02:50:09	2	We heard that?
02:50:11	3	A I don't know.
02:50:12	4	Q Did you not just hear that?
02:50:13	5	A I heard it.
02:50:13	6	Q Okay. So you did hear it?
02:50:15	7	A But I don't remember what you said my first
02:50:17	8	thought. I don't know what my first thought was.
02:50:19	9	Q Sure. But you you saw your response
02:50:20	10	your immediate response to Tory was Milagro; right?
02:50:23	11	A Oh, I heard that.
02:50:24	12	Q Yeah. Okay.
02:50:29	13	But Tory was actually talking about Ms. Pete;
02:50:31	14	correct?
02:50:32	15	A I don't know. I don't remember.
02:50:33	16	Q Well, we just listened together that he said
02:50:35	17	"No. I'm talking about the girl from the whole case.
02:50:38	18	Megan"?
02:50:40	19	A Okay. I don't remember. You said Ms. Pete.
02:50:43	20	I don't remember if he was talking about Megan Megan
02:50:46	21	who?
02:50:46	22	Q So "the girl from the whole case. Megan."
02:50:50	23	A What case?
02:50:50	24	Q That's his words.
02:50:51	25	A What case.

02:50:53	1	Q What case?
02:50:53	2	A You're you're trying to tell me what case
02:50:55	3	he is talking about right here, and I don't know what
02:50:57	4	case he is talking about.
02:50:58	5	What case? How do you know? You know for
02:51:00	6	sure he is talking about this case, or is there a
02:51:02	7	percentage it could be somebody else? I don't know. I
02:51:04	8	don't remember.
02:51:05	9	Q What other cases would you be talking to Tory
02:51:07	10	about?
02:51:07	11	A I don't know. I don't remember. I'm sure
02:51:09	12	we've talked about quite a few.
02:51:10	13	Q Of his own cases? I thought you said he
02:51:12	14	didn't have other cases?
02:51:13	15	A I don't know if he has cases. Say that again.
02:51:15	16	Q I thought you said you don't know?
02:51:17	17	A I just said I don't know about him having
02:51:19	18	other cases, but I don't know what case he is talking
02:51:20	19	about here.
02:51:21	20	Q What case did you represent Tory in or your
02:51:22	21	A Why are you saying "represent"? He didn't say
02:51:24	22	anything about representing, from what I heard on the
02:51:26	23	tape you just played.
02:51:27	24	What I heard was which is on the paper.
02:51:29	25	And what I'm telling you is I don't remember.

02:51:31	1	I don't personally know what he was talking about at
02:51:34	2	that time in 2023, or whatever date you said it was.
02:51:37	3	Q But I have a question for you.
02:51:38	4	A Sure.
02:51:39	5	Q So what case do you and Unite the People
02:51:44	6	represent Tory in?
02:51:47	7	A What case did we represent him in?
02:51:49	8	Q Correct. He was your client; right?
02:51:51	9	A Sure. Yeah.
02:51:53	10	Q And what case?
02:51:58	11	A I think the case we represented him on and
02:52:01	12	I'm not quite sure it was oh, okay. It was the
02:52:04	13	Daystar Peterson case. I remember that. That was the
02:52:07	14	case we represented him.
02:52:09	15	Q Daystar Peterson and what?
02:52:12	16	A I think he hired us for his case. I didn't
02:52:14	17	think there was anybody else included in his retainer
02:52:17	18	for our case.
02:52:22	19	Good one. That was a good one.
02:52:26	20	Q What case did you work on for Tory?
02:52:30	21	A The Daystar Peterson case.
02:52:32	22	Q And who against who?
02:52:33	23	A The State of California.
02:52:34	24	Q Okay. Which was about the shooting of
02:52:36	25	Ms. Pete; correct?

02:52:37	1	A Oh. I don't remember that. But I remember it
02:52:39	2	was Daystar Peterson verse the State of California on
02:52:42	3	the paperwork.
02:52:43	4	Q Okay. So CEO of UTP has a case for a client,
02:52:47	5	Tory Lanez, he knows that the case is State of
02:52:50	6	California versus Daystar Peterson, but he cannot
02:52:53	7	remember
02:52:55	8	A Yes. Right.
02:52:55	9	Q what the underlying cause of action is?
02:52:59	10	A The underlying cause of action.
02:53:00	11	Q Did I get that correct?
02:53:02	12	A You did good, but I don't know. I don't
02:53:04	13	remember
02:53:04	14	Q Okay.
02:53:04	15	A what the underlying cause of action. You
02:53:06	16	are asking me to remember something.
02:53:08	17	What I remember was it was a
02:53:09	18	Daystar Peterson the State of California versus
02:53:11	19	Daystar Peterson. They didn't put any underlying
02:53:15	20	actions in the subject titles.
02:53:17	21	Q So what was Tory being accused of in that
02:53:19	22	case?
02:53:22	23	A I don't really recall.
02:53:24	24	Q And you don't recall what he is serving a
02:53:26	25	prison sentence for?

02:53:29	1	A I served for being Black. I don't know what
02:53:32	2	he is serving for. I don't recall exactly the charges.
02:53:35	3	Q Okay. So your initial thought here or your
02:53:48	4	response here to say Milagro, in response to Tory
02:53:51	5	talking about Instagram Live, was Ms. Cooper because she
02:53:56	6	repeatedly posts on social media about the shooting;
02:54:01	7	correct?
02:54:03	8	A I don't remember.
02:54:04	9	Q And you helped coordinate what information
02:54:08	10	gets from Tory to Ms. Cooper; right?
02:54:10	11	MR. HAYDEN: Objection. Speculation.
02:54:12	12	THE WITNESS: Not at all.
02:54:14	13	MS. HAYRAPETIAN: Let's mark as Exhibit 90,
02:54:16	14	Tab 50-A, please, and B will be the transcript.
02:54:25	15	STENO TECH: Yes, ma'am. It will be just a
02:54:25	16	minute.
02:55:21	17	(A video clip was played.)
02:55:32	18	(Exhibit 90-A was marked for identification.)
02:55:32	19	(Exhibit 90-B was marked for identification.)
02:56:12	20	BY MS. HAYRAPETIAN:
02:56:13	21	Q Okay. So, on November 15, 2024, you had a
02:56:15	22	call with Tory over the prison phone; and as we just
02:56:17	23	heard, during that call, you discussed this case that,
02:56:21	24	quote, "lawyers from Roc Nation," quote, brought against
02:56:25	25	Ms. Cooper.

02:56:26	1	Tory asked you whether Roc Nation said, quote,
02:56:28	2	"some weird shit about him too," quote.
02:56:32	3	To which you responded that, quote, "They were
02:56:35	4	saying she," as in Ms. Cooper, "was communicating with
02:56:39	5	you or some bullshit," quote.
02:56:41	6	Tory then said, quote, "The funniest thing
02:56:45	7	about that is when they go looking, and they find
02:56:49	8	nothing. They're going to be like, what," end quote.
02:56:54	9	The "she" you were referring to was
02:56:56	10	Ms. Cooper; right?
02:56:57	11	A I don't remember.
02:56:58	12	Q You call that claim "bullshit"; correct?
02:57:01	13	A That's what it says.
02:57:04	14	Q And Ms. Cooper was communicating with Tory,
02:57:06	15	wasn't she?
02:57:08	16	MR. HAYDEN: Objection. Speculation.
02:57:12	17	THE WITNESS: Is that a question?
02:57:12	18	BY MS. HAYRAPETIAN:
02:57:13	19	Q Yeah.
02:57:13	20	A I don't remember.
02:57:14	21	Q You don't remember if
02:57:16	22	A I already said that. I thought you were
02:57:17	23	saying something else. No, I don't remember that.
02:57:20	24	MS. HAYRAPETIAN: Okay. So I would like to
02:57:21	25	mark as Exhibit 91, Tab 12.

02:57:44	1	(Exhibit 91 was marked for identification.)
02:57:44	2	BY MS. HAYRAPETIAN:
02:57:45	3	Q And this is a September 17, 2020, Instagram DM
02:57:49	4	produced from Ms. Cooper's phone. And it's a DM on
02:57:52	5	Instagram, Direct Message, from Tory Lanez to
02:57:54	6	Milagro Cooper.
02:57:55	7	And he says, "Send me your number, Mil." And
02:58:00	8	then Ms. Cooper provides her number.
02:58:04	9	And then there's a third message from
02:58:06	10	Ms. Cooper which states, "I don't know how your energy
02:58:10	11	is, but everything's been so crazy that I can only
02:58:13	12	imagine. I don't know how you are doing your live
02:58:15	13	tonight, but if you gave me that or any exclusive, it'd
02:58:19	14	change my life. I've been dying to know why you asked
02:58:22	15	for my number. Regardless of whatever you do, and how
02:58:25	16	you do it, you are not a throw away. No judgment holds
02:58:29	17	weight to that of The Most High. I wish you the best."
02:58:37	18	So Tory asked Ms. Cooper for her phone number,
02:58:43	19	right, in this DM?
02:58:44	20	A I don't know how this piece of paper that
02:58:45	21	somebody's printed I don't know. Anybody could have
02:58:47	22	drew this; right?
02:58:48	23	Q Right. So I'm asking okay. Well, it's
02:58:49	24	been produced from her cell phone. And all I'm asking
02:58:52	25	you to do is look at it and answer along.

02:58:55	1	A Oh, okay.
02:58:56	2	Q Okay. So you can see there, in that
02:58:58	3	screenshot of the DM, Tory is asking Ms. Cooper for her
02:59:02	4	phone number; correct?
02:59:03	5	A I don't know. On this paper, somebody said
02:59:05	6	something.
02:59:05	7	Q Okay. And that somebody up top shows
02:59:08	8	A What's the date?
02:59:09	9	Q I
02:59:10	10	A I don't see a date on here.
02:59:11	11	Q Well, I told you it was September 17, 2020,
02:59:13	12	and you could see it says September 17, right there.
02:59:16	13	A Was I home from prison?
02:59:22	14	I don't know nothing about this.
02:59:26	15	Q Following along.
02:59:27	16	A I am.
02:59:28	17	Q Okay. So you can see the first message,
02:59:29	18	right, asking for Milagro's phone number?
02:59:32	19	A No.
02:59:33	20	Q You don't see it?
02:59:33	21	A No. I see something that says, "Send me your
02:59:37	22	number, Mil."
02:59:38	23	Q Right. And Ms. Cooper responds, with her
02:59:40	24	cell phone number.
02:59:41	25	You see that?

02:59:41	1	A I don't know who responded, but I see a
02:59:43	2	cell phone number.
02:59:45	3	Q Great. So people ask for phone numbers when
02:59:49	4	they want to communicate directly; correct?
02:59:51	5	A I don't know. They could have been doing
02:59:53	6	anything.
02:59:54	7	Q Okay. So Tory and Ms. Cooper were
02:59:56	8	communicating directly, weren't they?
02:59:59	9	A I don't know.
03:00:00	10	Q Ms. Cooper responded that it would change her
03:00:02	11	life if Tory gave her an exclusive with him. An
03:00:06	12	exclusive live stream opportunity or podcast with Tory
03:00:09	13	would be a significant boost to Ms. Cooper's social
03:00:12	14	media business; right?
03:00:13	15	A I don't know.
03:00:18	16	MS. HAYRAPETIAN: Let's look at Tab 13 as
03:00:21	17	Exhibit Number 92.
03:00:34	18	(Exhibit 92 was marked for identification.)
03:00:34	19	BY MS. HAYRAPETIAN:
03:00:34	20	Q This is yet another DM from Tory to
03:00:36	21	Milagro Cooper. This was produced by the defendant
03:00:42	22	herself, and it's a December 13, 2022, message which I
03:00:46	23	think we've all established you were outside of prison,
03:00:48	24	given you were at trial Tory's trial.
03:00:51	25	And this is actually right as Tory's trial had

03:00:55	1	started. And he is messaging Milagro Cooper on
03:00:59	2	Instagram and saying, "What's ya number? Gotta ask you
03:01:01	3	something." And then again, Ms. Cooper provides her
03:01:04	4	number.
03:01:06	5	Do you see that in front of you?
03:01:07	6	A I see a piece of paper that's got a bunch of
03:01:10	7	stuff. I can make this at the house. So, yeah, I see
03:01:12	8	it on a piece of paper, what you are saying.
03:01:15	9	Q Do you frequently forge Instagram DMs?
03:01:18	10	A No. But you can AI this. You can do all
03:01:20	11	stuff with this.
03:01:22	12	Q Do you frequently AI things?
03:01:24	13	A I AI a lot of stuff.
03:01:25	14	Q Were you the one who AI'd Ms. Pete's porn
03:01:28	15	video?
03:01:28	16	A Ms. Pete's porn video?
03:01:28	17	MR. HAYDEN: Objection. Speculation.
03:01:30	18	MS. DIXON: Objection. Speculation.
03:01:31	19	THE WITNESS: Ms. Pete had a porn video?
03:01:33	20	BY MS. HAYRAPETIAN:
03:01:33	21	Q You took on Ms. Cooper's case; right? And you
03:01:35	22	know one of the charges is an AI deepfake pornographic
03:01:39	23	video; right?
03:01:40	24	A Is it? What was in the video?
03:01:42	25	Q I'm not sure.

03:01:42	1	A Oh. Either am I.
03:01:44	2	Q Okay. So you didn't make the AI porn video of
03:01:47	3	Ms. Cooper?
03:01:48	4	A I didn't know there was one.
03:01:50	5	Q Sorry. Of Ms. Pete.
03:01:51	6	A I didn't know there was one.
03:01:52	7	Q Okay. So you usually take on cases at UTP,
03:01:55	8	and you don't read the complaints of the cases you take
03:01:57	9	on.
03:01:58	10	Is that what I'm hearing?
03:01:59	11	A I didn't pass the bar. I don't know what
03:02:00	12	year, but I didn't pass the bar.
03:02:03	13	Q Okay.
03:02:05	14	MS. HAYRAPETIAN: Let's mark as Exhibit
03:02:06	15	Number 93, Tab 14.
03:02:24	16	(Exhibit 93 was marked for identification.)
03:02:24	17	BY MS. HAYRAPETIAN:
03:02:24	18	Q This is yet another iMessage produced by
03:02:27	19	Milagro Cooper in this litigation between Tory and
03:02:29	20	herself, and it was sent sometime after the trial was
03:02:34	21	coming to an end or had come to an end.
03:02:36	22	And it says, "Yoooooow. It's Tory. Hit me."
03:02:38	23	Do you see that in front of you?
03:02:40	24	A I see a piece of paper that says, "Yoooooow.
03:02:42	25	It's Tory. Hit me." I see that on a piece of paper.

03:02:46	1	Q Great. So I've now shown you documents
03:02:49	2	from ranging from 2020 to 2022 with Tory and
03:02:53	3	Ms. Cooper speaking directly; right?
03:02:56	4	A I don't know about what it is. I know it's on
03:02:58	5	a piece of paper that you gave me.
03:03:00	6	Q And that's what I showed you; right?
03:03:01	7	A No. You showed me a piece of paper that said,
03:03:03	8	"Yoooooow. It's Tory. Hit me." I don't know who it's
03:03:06	9	to, who it's not to. I don't know any of that.
03:03:08	10	Q Well, okay. I just told you it was produced
03:03:10	11	in this litigation by Ms. Cooper because it was a text
03:03:12	12	message.
03:03:13	13	A Then you should be asking her and not me then.
03:03:15	14	Q So so this comes back to your statement
03:03:18	15	actually that when when you said their communications
03:03:25	16	were bullshit, you were wrong, weren't you? 'Cause you
03:03:28	17	claim
03:03:28	18	A I said whose communications?
03:03:30	19	MS. DIXON: Objection. Calls for speculation.
03:03:31	20	BY MS. HAYRAPETIAN:
03:03:32	21	Q You claimed, in Exhibit 90, that it was
03:03:35	22	bullshit, the accusations in Ms. Cooper's complaint that
03:03:39	23	Tory and Milagro were speaking together; right?
03:03:44	24	A I don't remember that.
03:03:46	25	Q Okay. Well, we just listened to it.

03:03:47	1	We can play the tape back, if you want?
03:03:49	2	MS. DIXON: Objection. Mischaracterizes the
03:03:51	3	evidence.
03:03:51	4	THE WITNESS: You can play it all you want. I
03:03:53	5	still won't remember it.
03:03:54	6	BY MS. HAYRAPETIAN:
03:03:54	7	Q Okay. So Tory also said, "It would be funny,"
03:03:57	8	quote, right, "when Ms. Pete and her team," quote, "go
03:04:01	9	looking and they find nothing."
03:04:04	10	Is hiding evidence funny to you?
03:04:06	11	MR. HAYDEN: Objection. Speculation.
03:04:08	12	THE WITNESS: You said who said that?
03:04:08	13	BY MS. HAYRAPETIAN:
03:04:09	14	Q Tory said that. He said
03:04:11	15	A So why are you asking me is it funny to me?
03:04:13	16	Say it again.
03:04:14	17	Q I'm just curious.
03:04:15	18	A I don't understand what you are saying.
03:04:16	19	How are you saying he said that isn't funny to
03:04:17	20	me? Trump said a bunch of stuff.
03:04:19	21	Is that funny to you? Are you saying that?
03:04:22	22	You got to you got to narrow it down. I
03:04:23	23	didn't say any of that.
03:04:26	24	Q So you listened to the conversation; correct?
03:04:28	25	A Which conversation?

03:04:28	1	Q The one where we just heard Tory talking about
03:04:31	2	how this situation was funny, and how when the lawyers,
03:04:35	3	quote, "go looking and they find nothing."
03:04:37	4	A Oh. That's what he said?
03:04:39	5	Q Right. Yes.
03:04:40	6	A Why are you asking me?
03:04:41	7	Q We just listened together.
03:04:42	8	A Why are you asking me this?
03:04:43	9	Q Is it funny to you? Is hiding evidence
03:04:44	10	A Is what funny to me?
03:04:45	11	Q Is hiding evidence funny to you?
03:04:47	12	A Is it funny to you?
03:04:48	13	Q I'm not at my deposition today.
03:04:49	14	A I'm not really not either but okay. I don't
03:04:51	15	know what you are talking about.
03:04:53	16	Q Okay. Is intentionally destroying evidence
03:04:57	17	funny?
03:04:58	18	MR. HAYDEN: Objection. Speculation.
03:04:59	19	Mischaracterizes evidence or facts in evidence.
03:05:03	20	THE WITNESS: I don't know what you are
03:05:04	21	talking about.
03:05:05	22	BY MS. HAYRAPETIAN:
03:05:05	23	Q Did Tory tell you he found it funny to refuse
03:05:08	24	to cooperate during his deposition in this case?
03:05:12	25	A Whose deposition?

03:05:13	1	MS. DIXON: Objection. Assumes facts not in
03:05:14	2	evidence.
03:05:15	3	BY MS. HAYRAPETIAN:
03:05:16	4	Q Tory's deposition?
03:05:17	5	A Did he say what?
03:05:18	6	Q Did Tory tell you he found it funny to refuse
03:05:20	7	to cooperate during his deposition in this case?
03:05:24	8	A I don't remember him ever telling me anything.
03:05:25	9	I think I was deaf until I met you.
03:05:32	10	Q Did Tory tell you he thought he outsmarted
03:05:36	11	Ms. Pete and her team by having third parties relay his
03:05:39	12	messages to Ms. Cooper?
03:05:41	13	MR. HAYDEN: Speculation. Assumes facts not
03:05:42	14	in evidence.
03:05:44	15	THE WITNESS: I don't remember nothing. I
03:05:45	16	don't know what you are talking about.
03:05:46	17	BY MS. HAYRAPETIAN:
03:05:47	18	Q Okay.
03:05:48	19	MS. HAYRAPETIAN: Okay. Let's mark as Exhibit
03:05:49	20	Number 94, Tab 15-A, please. Can we get that ready to
03:05:56	21	play. And that will be 93 sorry 94-A, and the
03:06:01	22	transcript will be 94-B.
03:06:32	23	(Exhibit 94 was marked for identification.)
03:06:32	24	(Exhibit 94-B was marked for identification.)
03:06:33	25	(A video clip was played.)

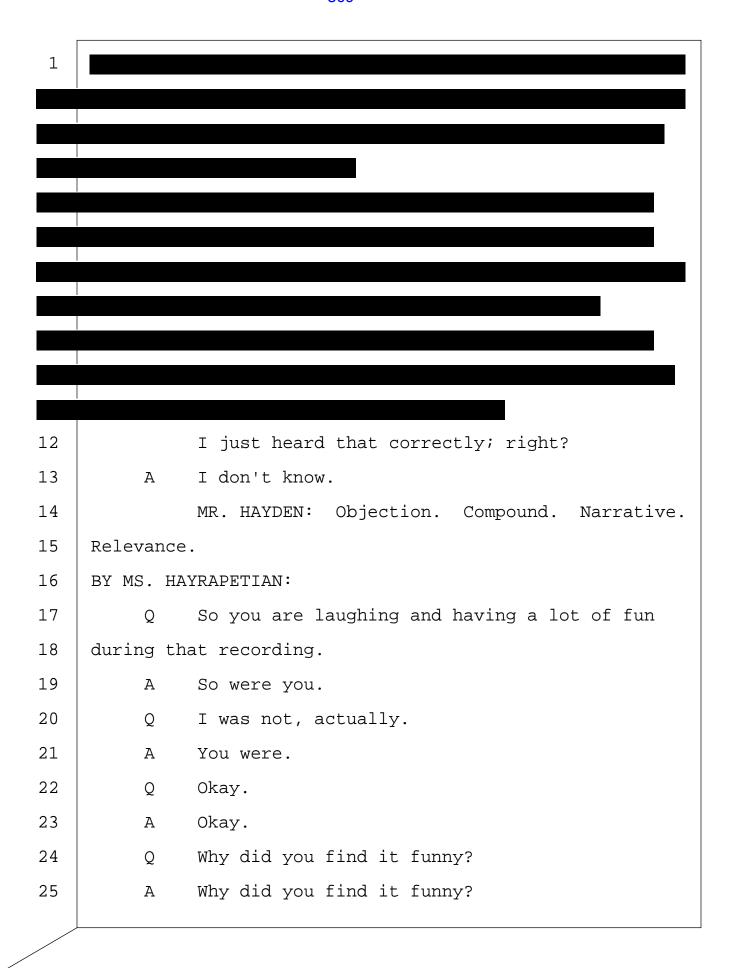
03:06:34	1	MS. HAYRAPETIAN: I don't think we can hear
03:06:35	2	again.
03:06:35	3	(A video clip was played.)
03:07:02	4	MS. HAYRAPETIAN: I'll just play it on my end
03:07:03	5	if you can't get it up.
03:07:05	6	THE WITNESS: You guys want any help? I can
03:07:06	7	help you.
03:07:08	8	MS. HAYRAPETIAN: No. It's okay.
03:07:09	9	(A video clip was played.)
03:07:20	10	BY MS. HAYRAPETIAN:
03:07:21	11	Q Okay. So, on November 19, you spoke to Tory
03:07:23	12	over the prison phone line, and you told Tory that you,
03:07:26	13	quote, "Had to pay \$5,000 today to retain a firm in
03:07:30	14	Florida today just so we can use have their shit just
03:07:35	15	like pro hac."
03:07:36	16	Do you remember that?
03:07:37	17	A I didn't even hear that right now.
03:07:40	18	MS. HAYRAPETIAN: Okay.
03:07:40	19	Can we play it again, please?
03:07:42	20	THE WITNESS: Let's listen.
03:07:48	21	STENO TECH: Yes, ma'am, just a moment.
03:07:49	22	(A video clip was played.)
03:08:15	23	BY MS. HAYRAPETIAN:
03:08:16	24	Q Okay. Did you hear you saying you had to pay
03:08:18	25	\$5,000 to the Florida firm?

03:08:21	1	A I heard that part. But where it says I
03:08:23	2	think it cut off before it finished what you guys
03:08:25	3	were saying it said.
03:08:28	4	Q Well, I think we all just listened. It
03:08:32	5	said
03:08:32	6	A You are just assuming it meant pro hac.
03:08:35	7	Q Well, what did it mean?
03:08:36	8	A I don't know, but I didn't hear it. For what
03:08:38	9	you just played and what the paper says, it's two
03:08:40	10	different things.
03:08:41	11	But so are we assuming it says
03:08:43	12	pro-football? Baseball? Why are we assuming pro hac
03:08:47	13	I'm just saying?
03:08:49	14	Q Well, we heard pro hac.
03:08:50	15	A Did you? No you didn't. Play it again. And
03:08:53	16	you guys can say whether you heard the word "hac"
03:08:56	17	because I sure didn't.
03:08:58	18	MS. HAYRAPETIAN: Okay. Go ahead. Play it
03:08:59	19	one more time.
03:09:00	20	STENO TECH: Okay. Just a moment.
03:09:17	21	THE WITNESS: They got a company that can help
03:09:20	22	you with you guys, if you need help.
03:09:24	23	(A video clip was played.)
03:09:32	24	BY MS. HAYRAPETIAN:
03:09:33	25	Q Okay. So I hear pro hac.

03:09:34	1	A Oh, did you?
03:09:35	2	Q If you hear something different, let me know.
03:09:37	3	A I did. I heard pro.
03:09:39	4	Q Pro. Okay.
03:09:40	5	And what were you talking about?
03:09:41	6	A I don't know. I don't remember.
03:09:42	7	Q Okay. So you were talking about hiring
03:09:47	8	local local counsel, Mr. Pancier, for Ms. Cooper's
03:09:52	9	case, correct, for \$5,000?
03:09:53	10	A I don't remember.
03:09:54	11	Q Okay. What other cases have you had in
03:09:58	12	Florida?
03:10:00	13	A I don't remember.
03:10:00	14	Q Who actually paid the \$5,000? Was it UTP or
03:10:07	15	Ms. Cooper?
03:10:08	16	A I don't remember.
03:10:08	17	Q Why are you updating Tory about expenses for
03:10:12	18	Ms. Cooper's case?
03:10:15	19	A I don't remember.
03:10:15	20	Q Tory's not Ms. Cooper's client. He is your
03:10:19	21	client; correct?
03:10:21	22	A I don't remember.
03:10:21	23	Q So why does Tory need to know about another
03:10:25	24	client's legal fees?
03:10:27	25	A Is that a question?

03:10:28	1	Q Yeah?
03:10:29	2	A Oh. I don't remember.
03:10:30	3	Q You are updating Tory because he is the one
03:10:33	4	funding Ms. Cooper's defense, aren't you?
03:10:35	5	MR. HAYDEN: Objection. Speculation.
03:10:38	6	MS. DIXON: Objection. Also assumes facts not
03:10:40	7	in evidence.
03:10:42	8	BY MS. HAYRAPETIAN:
03:10:42	9	Q Answer.
03:10:43	10	A What was the question?
03:10:44	11	MS. HAYRAPETIAN: Can you read it back,
03:10:44	12	Ms. Court Reporter, please.
03:10:46	13	(The following record was read:
03:10:46	14	"QUESTION: You are updating Tory because
03:10:46	15	he is the one funding Ms. Cooper's
03:10:46	16	defense, aren't you?")
03:10:59	17	THE WITNESS: Oh. You are not going to say
03:11:00	18	that from her?
03:11:01	19	No.
03:11:04	20	BY MS. HAYRAPETIAN:
03:11:04	21	Q No? Oh, you remember the answer to this one?
03:11:07	22	A I think it was I think what she said I said
03:11:09	23	no to.
03:11:10	24	Q Okay. So you had an answer to this one?
03:11:14	25	A You want it again?

```
1
               I'm just checking. Yeah.
          Q
 2
          Α
               No.
 3
          Q
               Okay. Your memory is back?
 4
               MS. DIXON:
                           Objection. You are being
 5
     argumentative and badgering the witness.
 6
               THE WITNESS: Say it again. I couldn't hear
 7
     you.
     BY MS. HAYRAPETIAN:
 8
 9
               Your memory is back now?
10
               Oh, it was gone? Oh.
          Α
11
               You've only said you couldn't remember maybe
          0
12
     100-something times today.
13
                    Things I didn't remember; right?
          Α
14
          0
               Okay.
15
          Α
               You want me to lie. I can lie, if you want me
16
     to.
17
               What do you want me to lie about?
               MS. HAYRAPETIAN: Let's mark as Exhibit 95,
18
19
     Tab 44-A, if we can pull that up, and the transcript of
20
     the same will be 95-B.
               (Exhibit 95-A was marked for identification.)
21
22
               (Exhibit 95-B was marked for identification.)
23
               (A video clip was played.)
24
     BY MS. HAYRAPETIAN:
25
          Q
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03:17:59	1	Q I'm not laughing.
03:18:00	2	A Oh, you were a minute ago. I don't recall. I
03:18:03	3	don't remember.
03:18:04	4	Q You don't remember why you found it funny?
03:18:06	5	A Huh-uh.
03:18:07	6	Q Okay. So you were sharing information, you
03:18:10	7	shouldn't. And you weren't being discreet here; right?
03:18:14	8	MR. HAYDEN: Objection. Speculation.
03:18:17	9	MS. DIXON: Objection. Relevance to this
03:18:19	10	case.
03:18:19	11	BY MS. HAYRAPETIAN:
03:18:20	12	Q Right?
03:18:21	13	A I don't recall.
03:18:22	14	Q On this call, you told Tory confidential
03:18:24	15	information that you knew you shouldn't share; correct?
03:18:28	16	MR. HAYDEN: Objection. Speculation.
03:18:29	17	Relevance.
03:18:30	18	THE WITNESS: I don't recall.
03:18:30	19	BY MS. HAYRAPETIAN:
03:18:31	20	Q By sharing secrets with Tory, you were showing
03:18:33	21	him that
03:18:34	22	A What were his secrets? How do how do you
03:18:36	23	know that's a secret? How do you know that's not public
03:18:38	24	information? How do you know you can't look it up right
03:18:40	25	now? So how is it a secret?

03:18:42	1	Q Well, because you said
03:18:43	2	A I don't recall.
03:18:44	3	Q Because you said, quote
03:18:45	4	A What I said don't mean nothing. You just said
03:18:47	5	what I said don't meaning nothing. I don't recall.
03:18:49	6	Q So I'm speaking.
03:18:51	7	A Okay. I just was.
03:18:53	8	Q Sir.
03:18:53	9	A Ma'am.
03:18:54	10	Q You said, "Yeah. I can't tell you because
03:18:56	11	Mitch told me not to because you are our client." So
03:19:01	12	A Okay.
03:19:01	13	Q you said something that you were not
03:19:03	14	supposed to share?
03:19:05	15	A That don't make it the law because that's what
03:19:07	16	I said.
03:19:08	17	MR. HAYDEN: Objection. Speculation.
03:19:08	18	Relevance.
03:19:09	19	BY MS. HAYRAPETIAN:
03:19:10	20	Q I'm not talking about the law.
03:19:11	21	MS. DIXON: Objection. That's also a
03:19:12	22	misstatement of the law.
03:19:13	23	BY MS. HAYRAPETIAN:
03:19:13	24	Q And you were showing him that you are willing
03:19:15	25	to share secrets, weren't you?

03:19:16	1	MR. HAYDEN: Objection. Speculation.
03:19:18	2	THE WITNESS: I don't remember nothing.
03:19:18	3	BY MS. HAYRAPETIAN:
03:19:20	4	Q Tory learned he could trust you to pass along
03:19:22	5	information; correct?
03:19:24	6	MR. HAYDEN: Objection. Speculation.
03:19:29	7	THE WITNESS: Was that a question?
03:19:30	8	BY MS. HAYRAPETIAN:
03:19:30	9	Q Uh-huh.
03:19:30	10	A Oh. He said what?
03:19:34	11	Q Tory learned he could trust you to pass along
03:19:37	12	confidential information; correct?
03:19:41	13	A I don't know what you are talking about.
03:19:43	14	Q When Tory gives you information about
03:19:46	15	Ms. Pete, he knows you will share that too?
03:19:49	16	A Who?
03:19:49	17	MR. HAYDEN: Objection. Speculation.
03:19:51	18	THE WITNESS: Who's Ms. Pete?
03:19:51	19	BY MS. HAYRAPETIAN:
03:19:52	20	Q We've been talking about Ms. Pete.
03:19:54	21	A Oh. The same person we've been talking about
03:19:56	22	all day. Oh, I don't remember.
03:19:59	23	Q And that's exactly what Tory wanted, right,
03:20:03	24	someone who would share his secrets with Ms. Cooper?
03:20:07	25	MR. HAYDEN: Objection. Speculation.

```
1
                             I don't know nothing.
               THE WITNESS:
 2.
     BY MS. HAYRAPETIAN:
 3
          Q
 7
               MR. HAYDEN: Objection. Speculation.
                                                      Calls
     for a legal conclusion.
 8
 9
               THE WITNESS: And what is considered private
10
     information? What are you talking about? Anything that
11
    was shared that you just read was public information; so
12
     I don't know. I don't remember what you are talking
13
     about. I don't know nothing.
14
     BY MS. HAYRAPETIAN:
15
          Q
               That don't make it the law. That don't make
          Α
19
     it right.
20
               I'm not talking about the law.
          0
21
                      That's what you just said is that
          Α
               Okay.
22
     I'm -- divulging something that's private. I ain't
23
     divulging nothing that's private. That was made public
24
     to me.
25
               But to answer you're question, I don't
```

```
1
     remember.
 2
     BY MS. HAYRAPETIAN:
 3
               It doesn't matter what the information was
          Q
 4
     because you told Tory you were not supposed to tell him,
 5
     and then you told him; right?
 6
               MR. HAYDEN: Objection. Relevance.
 7
               THE WITNESS: I don't remember. I don't
     remember.
 8
 9
     BY MS. HAYRAPETIAN:
10
               Luckily you don't have to remember because I
          0
11
     just played back your own voice.
12
               Did you?
          Α
13
               Right.
          Q
14
               Oh.
          Α
15
          0
               So you agree with me that --
16
               I don't agree with you on nothing at all.
          Α
17
          Q
20
               MR. HAYDEN: Objection. Speculation.
21
                              I don't know what you are
               THE WITNESS:
2.2
     talking about.
23
     BY MS. HAYRAPETIAN:
24
          Q
               Okay.
               I ain't agreeing with you on nothing since
25
          Α
```

03:21:36	1	we've been here.
03:21:38	2	Q On November 1, 2024, you and Ms. Cooper dialed
03:21:42	3	each other three times, and you spoke to her for almost
03:21:46	4	22 minutes, and that's reflected in the prior exhibit
03:21:49	5	the AT&T document, Exhibit 87. And earlier that day you
03:21:59	6	were texting with Ms. Cooper and your employee
03:22:03	7	Ms. Jazmyne Jamison.
03:22:07	8	MS. HAYRAPETIAN: I'll mark for the record as
03:22:08	9	Exhibit 96, as Tab 48.
03:22:32	10	(Exhibit 96 was marked for identification.)
03:22:33	11	BY MS. HAYRAPETIAN:
03:22:33	12	Q So this is a group chat between Jazmyne,
03:22:36	13	yourself, and Ms. Cooper. And in this group chat you
03:22:39	14	texted Ms. Cooper, "Milagro, I need to talk to this guy.
03:22:43	15	I need Akademik's number. What he is saying makes all
03:22:48	16	the sense in the world, and he is getting your back. I
03:22:52	17	want to talk to this guy. You set that up. Please,
03:22:56	18	tell him the CEO of Unite the People wants to talk to
03:22:59	19	him."
03:23:04	20	You were referring to DJ Akademiks; correct?
03:23:07	21	A I don't remember.
03:23:08	22	Q You were referring to Tory's friend and
03:23:11	23	blogger Livingston Allen also known as DJ Akademiks;
03:23:16	24	correct?
03:23:17	25	A I don't remember.

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03:23:17	1	Q Is there any other Akademiks you know whose
03:23:24	2	number you would be asking for?
03:23:25	3	A I don't remember.
03:23:26	4	Q What did you mean when you texted that "what
03:23:30	5	he is saying makes all the sense in the world"?
03:23:33	6	A I do not remember.
03:23:34	7	Q What was DJ Akademiks saying that made all the
03:23:37	8	sense in the world?
03:23:39	9	A I do not remember.
03:23:40	10	Q What did you mean when you texted Ms. Cooper
03:23:42	11	that "he is getting your back"?
03:23:45	12	A I do not remember.
03:23:46	13	Q How was DJ Akademiks getting Ms. Cooper's
03:23:49	14	back?
03:23:50	15	A I don't remember.
03:23:51	16	Q Is Tory paying Cooper through DJ Akademiks?
03:23:54	17	A I don't know who remember nothing or know
03:23:57	18	what you are talking about.
03:23:58	19	Q Why did you need Ms. Cooper to set up a phone
03:24:00	20	call with DJ Akademiks?
03:24:02	21	A I don't remember.
03:24:03	22	Q Did you end up having a conversation with
03:24:04	23	DJ Akademiks?
03:24:06	24	A I don't remember.
03:24:08	25	Q What did you discuss with DJ Akademiks?

03:24:12	1	A I don't remember.
03:24:14	2	MR. HAYDEN: Objection. Asked and answered.
03:24:15	3	BY MS. HAYRAPETIAN:
03:24:15	4	Q Was Tory present when you spoke to
03:24:18	5	DJ Akademiks?
03:24:21	6	MR. HAYDEN: Objection. Speculation.
03:24:23	7	THE WITNESS: I don't think Tory can be
03:24:24	8	present anywhere from prison; right?
03:24:26	9	BY MS. HAYRAPETIAN:
03:24:27	10	Q Well, could be present on a three-way call.
03:24:29	11	A Oh. Is that present? Is it?
03:24:32	12	Q It is.
03:24:32	13	A Oh, I didn't know. I don't know. I don't
03:24:34	14	remember ever talking to anybody.
03:24:37	15	Q What do you know of Ms. Cooper's relationship
03:24:39	16	with DJ Akademiks?
03:24:41	17	A I don't know nothing.
03:24:44	18	Q Did Tory tell you to talk to Ms. Cooper to get
03:24:46	19	connected to DJ Akademiks?
03:24:49	20	A I don't know nothing.
03:24:53	21	Q On November 7, Ms. Cooper's phone log shows
03:24:56	22	seven attempted calls between your phone and hers, and
03:24:59	23	that's on the AT&T, Exhibit 87. And on November 7, you
03:25:05	24	also texted Ms. Cooper, "Can you call me? It's
03:25:09	25	important. Thank you."

03:25:12	1	MS. HAYRAPETIAN: And I'm going to mark as
03:25:13	2	Exhibit 97 the first text message is what I'm
03:25:18	3	referring to.
03:25:33	4	(Exhibit 97 was marked for identification.)
03:25:33	5	BY MS. HAYRAPETIAN:
03:25:33	6	Q So what was so important that she needed to
03:25:41	7	call you urgently?
03:25:43	8	A I don't remember.
03:25:43	9	Q Why were you so desperate to reach her on
03:25:47	10	November 7?
03:25:50	11	A I don't see it saying anything about somebody
03:25:52	12	being desperate, but if you mean the same thing you just
03:25:54	13	read that don't say nothing about desperate, where it
03:25:57	14	says, "Can you call me, it's important," I don't
03:26:00	15	remember.
03:26:05	16	Q You were passing on messages between Tory and
03:26:08	17	Ms. Cooper; right?
03:26:09	18	A Never ever.
03:26:10	19	Q That that answer, you remember?
03:26:13	20	A Did I answer it?
03:26:16	21	Q You you said your memory is back; right?
03:26:18	22	A Did I answer it?
03:26:19	23	Q Yeah, you did.
03:26:20	24	A Okay. What did I say?
03:26:21	25	Q My follow-up question is

03:26:22	1	A What did I say? Never.
03:26:24	2	Q is your memory is back?
03:26:25	3	A So then it is never ever.
03:26:25	4	Q So your memory is back? I'm just checking.
03:26:27	5	A Are you saying my memory is gone?
03:26:29	6	Q You you are the one who said you didn't
03:26:30	7	remember for 90 percent 98 percent of my questions
03:26:33	8	today. Actually, 99.9.
03:26:35	9	A So you should have picked a different set of
03:26:37	10	questions, because for 98 percent of your questions that
03:26:39	11	you picked, I don't remember.
03:26:41	12	Q Why? 'Cause you don't like my questions.
03:26:44	13	A Because I don't remember.
03:26:46	14	You want me to fake now. If you are telling
03:26:48	15	me to fake here on camera tell me to lie on camera
03:26:50	16	but as of right now, I don't remember nothing.
03:26:53	17	Q It's just that your memory seems very
03:26:55	18	convenient because you just said you never ever did
03:26:58	19	something. So that one, you remembered; right?
03:27:01	20	A Did I say that? If I said that, then that's
03:27:05	21	what I said.
03:27:07	22	You can't make me unless you are trying to
03:27:09	23	put words in my mouth, tell me. Tell me what you want
03:27:11	24	me to say. Because if I don't remember, all I can say
03:27:14	25	is "I don't remember."

03:27:15	1	Q On December 12th, 2024, you and Ms. Cooper
03:27:19	2	attempted to reach each other six times. One of your
03:27:23	3	cases you spoke for over six minutes. You also texted
03:27:29	4	Ms. Cooper on December 12.
03:27:32	5	MS. HAYRAPETIAN: And I'm adding as
03:27:33	6	Exhibit 97 sorry 98.
03:27:54	7	STENO TECH: Counsel, can we get the Exhibit
03:27:55	8	Number for 98?
03:27:57	9	MS. HAYRAPETIAN: Tab 54.
03:27:57	10	STENO TECH: Thank you.
03:27:57	11	(Exhibit 98 was marked for identification.)
03:27:58	12	BY MS. HAYRAPETIAN:
03:27:58	13	Q You texted, "Hey, when you get a chance, if
03:28:00	14	you could give me a call, that would be great, as soon
03:28:02	15	as possible."
03:28:03	16	What was urgent that you needed to discuss
03:28:07	17	with her?
03:28:08	18	A I'm reading what is right here. I don't see
03:28:10	19	anything saying that it was urgent. I think that's
03:28:12	20	something that you are just making up.
03:28:15	21	But from right here, I don't remember whatever
03:28:17	22	it was about.
03:28:19	23	Q Okay. So do you see the last four words that
03:28:21	24	say, "as soon as possible"?
03:28:23	25	A I don't see urgent. I see as soon as

03:28:25	1	possible, but I don't see urgent.
03:28:26	2	Q Okay. And what do the word do the words
03:28:29	3	"as soon as possible" indicate a sense of urgency to
03:28:31	4	you?
03:28:32	5	A No. It indicates as soon as possible.
03:28:35	6	Q And what does that mean?
03:28:37	7	A As soon as you possibly can.
03:28:38	8	Q But can you say that in different words?
03:28:41	9	A As soon as possible? I can say that in
03:28:44	10	Swahili.
03:28:45	11	Q You didn't say no rush; right?
03:28:47	12	A Oh. I didn't say no rush.
03:28:48	13	Q Right.
03:28:49	14	A No. I just said as soon as possible.
03:28:50	15	Q So you said the opposite of no rush, as in
03:28:51	16	it's important?
03:28:52	17	A What is the opposite of no rush?
03:28:54	18	Q You tell me.
03:28:55	19	A I don't know. You the one that know all the
03:28:56	20	words. I don't remember; remember?
03:29:02	21	Q The following day, December 13, 2024, right
03:29:06	22	after your urgent or as soon as possible text
03:29:09	23	message, Ms. Cooper posted on social media.
03:29:14	24	A She didn't post the day before?
03:29:18	25	MS. HAYRAPETIAN: Marking as Tab 17,

03:29:21	1	Exhibit 99.
03:29:39	2	(Exhibit 99 was marked for identification.)
03:29:39	3	BY MS. HAYRAPETIAN:
03:29:39	4	Q Ms. Cooper posted about your interview with
03:29:41	5	"TMZ," quoting from a direct lead, quote, "Tory Lanez,
03:29:45	6	his father Sonstar Peterson, and blogger Milagro Gramz
03:29:48	7	are firing back at claims from Megan Thee Stallion's
03:29:51	8	lawyers that they're conspiring to spread misinformation
03:29:54	9	and harass the Roc Nation rapper in a complaint filed
03:29:57	10	this week. These allegations largely stem from
03:30:00	11	jailhouse phone calls between Tory, Sonstar, and
03:30:04	12	Milagro, real name Milagro Cooper, but Ceasar McDowell
03:30:07	13	CEO of Unite the People says his client is a victim of a
03:30:10	14	calculated legal takedown."
03:30:18	15	So that's just a few hours from your "call me
03:30:21	16	as soon as possible" text. That's what you were
03:30:25	17	discussing; right?
03:30:27	18	MR. HAYDEN: Objection. Compound. Narrative.
03:30:29	19	THE WITNESS: That's I didn't see you said
03:30:31	20	I discussed anything. I thought you said I text
03:30:34	21	something.
03:30:34	22	Where does it say I discussed something?
03:30:38	23	BY MS. HAYRAPETIAN:
03:30:38	24	Q I'm asking you.
03:30:39	25	A I'm asking you. I don't see what you are

03:30:41	1	saying.
03:30:42	2	Q Your "TMZ" article is what you wanted to
03:30:44	3	discuss with Ms. Cooper as soon as possible; correct?
03:30:47	4	A I don't remember.
03:30:51	5	Q So the day after your "as soon as possible"
03:30:54	6	text to Ms. Cooper, she posts your "TMZ" article about
03:31:00	7	Tory Lanez and Megan Pete; correct?
03:31:02	8	A I don't know. You said it, not me.
03:31:06	9	Q You did a "TMZ" interview about this case;
03:31:08	10	correct?
03:31:13	11	A Probably.
03:31:13	12	Q You spoke to Tory before that interview;
03:31:15	13	right?
03:31:15	14	A I don't remember ever speaking to him.
03:31:18	15	Q You spoke to Ms. Cooper before the interview;
03:31:19	16	right?
03:31:21	17	A I don't remember speaking to her.
03:31:23	18	Q You were coordinating your public message with
03:31:26	19	both of them, weren't you?
03:31:28	20	MR. HAYDEN: Objection. Speculation.
03:31:33	21	THE WITNESS: I never coordinated nothing with
03:31:35	22	nobody. I don't know what you are talking about.
03:31:37	23	BY MS. HAYRAPETIAN:
03:31:37	24	Q You wanted everyone telling the same story and
03:31:40	25	promoting the same message; correct?

03:31:42	1	MR. HAYDEN: Objection. Speculation.
03:31:42	2	Argumentative.
03:31:43	3	THE WITNESS: You are saying I wanted.
03:31:44	4	What did I want? Why would I want something?
03:31:47	5	BY MS. HAYRAPETIAN:
03:31:48	6	Q Is that your answer?
03:31:50	7	A Yeah, that's my answer.
03:31:55	8	Q Okay.
03:32:00	9	MS. HAYRAPETIAN: So marking as Exhibit 100,
03:32:01	10	Tab 18.
03:32:05	11	MS. DIXON: I just had 92.
03:32:12	12	THE WITNESS: We have to take a break in a
03:32:13	13	minute. I'm going to have to get some more Tylenol.
03:32:15	14	What time did I take that Tylenol at? What
03:32:18	15	time was the lunch break? Was it lunch break when I
03:32:21	16	took the Tylenol? It was before the lunch break?
03:32:23	17	MR. HAYDEN: We're still on the record, guys.
03:32:24	18	We'll get to it.
03:32:25	19	THE WITNESS: I'm not giving none of that. My
03:32:27	20	head is throbbing over here. I need medicine.
03:32:29	21	MS. HAYRAPETIAN: Do you need a break right
03:32:30	22	now?
03:32:31	23	THE WITNESS: Yes.
03:32:32	24	MS. HAYRAPETIAN: Okay. Let's go off the
03:32:33	25	record, and let's take ten.

03:32:34	1	THE VIDEOGRAPHER: The time is 3:32 PM
03:32:36	2	Pacific time. We are now off the record.
03:32:41	3	(Recess was taken.)
03:46:10	4	THE VIDEOGRAPHER: The time is 4:01
04:01:33	5	Pacific time. We are back on the record.
04:01:37	6	MS. DIXON: I don't think I got 100.
04:01:38	7	MS. HAYRAPETIAN: We haven't passed it out
04:01:40	8	yet.
04:01:41	9	MS. DIXON: Okay.
04:01:41	10	MS. HAYRAPETIAN: So let me play you a clip
04:01:42	11	from a phone conversation you had with Tory on
04:01:46	12	November 1st.
04:01:47	13	And, for the audio, it's Tab 59-A. And then
04:01:54	14	we will be marking everything as Exhibit 100. The
04:01:59	15	transcript will be 100-B. Video will be 100-A.
04:02:05	16	(Exhibit 100-A was marked for identification.)
04:02:05	17	(Exhibit 100-B was marked for identification.)
04:02:44	18	STENO TECH: I'm going to start the clip in
04:02:44	19	just a second. Just let me know if everyone can hear
04:02:47	20	it.
04:02:48	21	(A video clip was played.)
04:02:51	22	MS. HAYRAPETIAN: That was good. If we can
04:02:52	23	raise the volume, that would be better.
04:02:55	24	STENO TECH: Of course.
04:02:56	25	MS. HAYRAPETIAN: Perfect. Thank you.

04:02:57	1	STENO TECH: Would you like to start the clip?
04:02:59	2	MS. HAYRAPETIAN: Yes, please.
04:03:24	3	(A video clip was played.)
04:04:38	4	BY MS. HAYRAPETIAN:
04:04:39	5	Q Okay. So what did you understand Tory to mean
04:04:44	6	when he asked if the two of you should do another
04:04:48	7	bailout?
04:04:49	8	A I do not know.
04:04:50	9	Q Have you heard the word "bailout"?
04:04:58	10	A I don't know.
04:04:59	11	Q So how come he is saying "another bailout,"
04:05:02	12	indicating that there was a prior bailout?
04:05:05	13	A I remember they bailed out the banks. That
04:05:08	14	might be what's happening. I don't know.
04:05:10	15	Q Who bailed out the banks?
04:05:12	16	A I think the Government bailed out the banks.
04:05:14	17	Q Okay. So how why would Tory be saying,
04:05:17	18	"You don't think we should do another bailout"?
04:05:21	19	A Probably talking politics. I do not know. I
04:05:25	20	don't remember.
04:05:26	21	Q Okay. Why do you and Tory frequently talk
04:05:31	22	about politics?
04:05:31	23	A I don't remember everything we talked about.
04:05:33	24	Q Okay. But you think he is talking to you
04:05:35	25	about politics; right?

04:05:37	1	A I don't know.
04:05:40	2	Q Do you identify with the Democratic or
04:05:42	3	Republican party?
04:05:43	4	MR. HAYDEN: Objection. Relevance.
04:05:48	5	THE WITNESS: I don't know.
04:05:48	6	BY MS. HAYRAPETIAN:
04:05:48	7	Q You don't know? You don't have a preferred
04:05:50	8	party?
04:05:54	9	A The "House Party" is good sometimes.
04:06:04	10	Q Is Tory saying you and UTP have bailed out
04:06:08	11	others in the past by bailout?
04:06:11	12	A I don't know.
04:06:12	13	Q Tory funded this campaign run under UTP's name
04:06:17	14	to improve his public image; right?
04:06:19	15	MR. HAYDEN: Objection. Speculation.
04:06:22	16	THE WITNESS: I don't know.
04:06:22	17	BY MS. HAYRAPETIAN:
04:06:22	18	Q What did you understand Tory to mean when he
04:06:26	19	said, quote, "like get some cheap ones and the way you
04:06:31	20	can still give money to the firm."
04:06:34	21	A I do not know.
04:06:35	22	Q Tory is saying that he could pay for cheaper
04:06:39	23	bails of UTP clients; right?
04:06:41	24	A I don't know.
04:06:43	25	Q And you understood Tory to also mean that UTP

04:06:45	1	could take	e a portion of his money too; right?
04:06:48	2		MR. HAYDEN: Objection. Speculation.
04:06:50	3		THE WITNESS: I don't know.
04:06:50	4	BY MS. HAY	YRAPETIAN:
04:06:51	5	Q	So UTP could use Tory's money for his own
04:06:53	6	purposes;	right?
04:06:54	7		MR. HAYDEN: Objection. Speculation.
04:06:56	8		THE WITNESS: I don't know what you are
04:06:56	9	talking al	bout.
04:06:57	10	BY MS. HA	YRAPETIAN:
04:06:58	11	Q	And you acknowledge that paying for people's
04:06:59	12	bails migl	nt be another good look; right?
04:07:04	13	A	Paying for people's bails? Unite the People
04:07:07	14	don't pay	for nobody's bails.
04:07:09	15	Q	Quote, "might be another good look."
04:07:11	16		What were you talking about there?
04:07:13	17	A	I don't remember, but I know Unite the People
04:07:15	18	don't bai	l nobody.
04:07:17	19		Bail bonds offices do bails, not law firms.
04:07:19	20		You guys do bails?
04:07:21	21	Q	And you guys pay the bail bond officers?
04:07:24	22	A	What bail bonds? Unite the People don't do no
04:07:26	23	bail bonds	5.
04:07:28	24	Q	So what is the bailout you and Tory are
04:07:30	25	talking al	bout here?

04:07:31	1	A I don't remember.
04:07:34	2	Q You are advising Tory as to his public
04:07:37	3	relations and image, right, in this conversation?
04:07:39	4	MR. HAYDEN: Objection. Speculation.
04:07:41	5	THE WITNESS: I don't remember.
04:07:44	6	BY MS. HAYRAPETIAN:
04:07:45	7	Q And you claim that you should, quote, "make it
04:07:46	8	bigger this time" with Tory donating \$100,000?
04:07:53	9	A I don't know.
04:07:54	10	Q So let's let's read back your words that we
04:07:57	11	just heard. "Yeah, could do that. But I tell you what
04:08:00	12	we do. We make it bigger this time. Tory Lanez donated
04:08:05	13	100,000, and he still 30. You know what I mean?"
04:08:09	14	What did you mean?
04:08:11	15	A I don't remember.
04:08:12	16	Q So Tory was planning to donate \$100,000 to
04:08:22	17	UTP; correct?
04:08:23	18	MR. HAYDEN: Objection. Speculation.
04:08:27	19	THE WITNESS: I don't remember.
04:08:28	20	BY MS. HAYRAPETIAN:
04:08:28	21	Q Correct?
04:08:29	22	A I don't remember.
04:08:29	23	Q Did Tory donate \$100,000 to UTP?
04:08:36	24	A I don't remember what he donated.
04:08:38	25	Q Then you tell Tory, "Oh, damn it, but, uh,

04:08:43	1	yeah. We could do some shit. Like I really want to
04:08:47	2	holler at you about this Milagro shit and my ideas and
04:08:51	3	see what you think 'cause I got to get to onto the
04:08:57	4	indiscernible."
04:08:58	5	What were you talking about?
04:09:00	6	A It was indiscernible to me too. I don't know.
04:09:06	7	Q Well, only one word was indiscernible. The
04:09:09	8	rest are fine; so
04:09:10	9	A Oh. Was it? I don't know.
04:09:11	10	Q What were you talking about? What ideas did
04:09:13	11	you have regarding Milagro's shit?
04:09:16	12	MS. DIXON: Objection. Calls for a legal
04:09:17	13	strategy. Calls for a attorney-client privilege and
04:09:21	14	work product.
04:09:24	15	THE WITNESS: I don't know.
04:09:29	16	BY MS. HAYRAPETIAN:
04:09:29	17	Q What what ideas did you have about
04:09:31	18	Milagro's case?
04:09:32	19	MR. HAYDEN: Objection. Asked and answered.
04:09:36	20	THE WITNESS: I don't know.
04:09:36	21	BY MS. HAYRAPETIAN:
04:09:36	22	Q You don't know, or you don't remember?
04:09:42	23	A I don't know if I remember.
04:09:46	24	Q That's a good that's a new one?
04:09:47	25	A Is it?

04:09:48	1	Q Yeah. That's a new one.
04:09:51	2	You're telling Tory about your interactions
04:09:55	3	with Ms. Cooper; right?
04:09:58	4	A I don't remember.
04:10:00	5	Q Why are you reporting back to Tory if it's not
04:10:02	6	to tell your favorite client about another client
04:10:07	7	MR. HAYDEN: Objection. Speculation.
04:10:09	8	BY MS. HAYRAPETIAN:
04:10:09	9	Q whose litigation he's sponsoring and
04:10:10	10	funding?
04:10:13	11	MR. HAYDEN: Objection. Speculation.
04:10:15	12	THE WITNESS: I don't remember.
04:10:16	13	I could have swore I said my favorite client
04:10:18	14	was Allan McIntosh, but I'm sure you guys already have
04:10:21	15	it.
04:10:21	16	BY MS. HAYRAPETIAN:
04:10:23	17	Q No. You said that was the most high-profile
04:10:25	18	client.
04:10:26	19	A No.
04:10:26	20	Q You you actually have never told me who
04:10:27	21	your favorite client is?
04:10:29	22	A Then why did you just say he was my favorite?
04:10:31	23	You are making it up?
04:10:32	24	Q I'm assuming.
04:10:33	25	A Oh, you shouldn't assume. It makes

04:10:35	1	Q I mean tell me who is your favorite client?
04:10:38	2	MR. HAYDEN: Objection. Asked and answered.
04:10:39	3	THE WITNESS: I don't remember.
04:10:40	4	BY MS. HAYRAPETIAN:
04:10:41	5	Q You don't remember?
04:10:43	6	A Huh-uh.
04:10:43	7	Q So it is Tory?
04:10:44	8	MR. HAYDEN: Objection. Speculation.
04:10:45	9	Assuming facts not in evidence.
04:10:47	10	BY MS. HAYRAPETIAN:
04:10:47	11	Q I mean, you only talked to him at least twice
04:10:49	12	a week.
04:10:50	13	A Who?
04:10:50	14	MR. HAYDEN: Objection. Argumentative.
04:10:51	15	BY MS. HAYRAPETIAN:
04:10:52	16	Q Tory. On a recorded line.
04:10:53	17	A I don't remember.
04:10:54	18	Q How often do you talk to Tory not on a
04:10:56	19	recorded line?
04:10:57	20	A Tory who?
04:10:59	21	Q Tory Lanez, Daystar Peterson.
04:11:01	22	A Oh, that rapper guy.
04:11:02	23	Q Yep.
04:11:03	24	A I think he is a singer. He can sing.
04:11:07	25	I don't know. I don't remember talking to

04:11:08	1	him. I told you I was deaf until I met you.
04:11:14	2	Q Okay. You've been coordinating with both Tory
04:11:20	3	and Ms. Cooper, asking them for their thoughts or new
04:11:23	4	ideas to improve Tory's public image and get him out of
04:11:26	5	prison; right?
04:11:27	6	MR. HAYDEN: Objection. Speculation.
04:11:29	7	THE WITNESS: I don't even know what you just
04:11:30	8	said. I was talking to who about what?
04:11:33	9	BY MS. HAYRAPETIAN:
04:11:34	10	Q You've been coordinating with both Tory and
04:11:36	11	Ms. Cooper regarding Ms. Cooper's case; correct?
04:11:41	12	A I don't know what you are talking about.
04:11:44	13	Q Okay. UTP issued a press release about Tory's
04:11:54	14	deposition in this litigation.
04:11:58	15	MS. HAYRAPETIAN: And I'm marking as
04:11:59	16	Exhibit 101.
04:12:27	17	(Exhibit 100 was marked for identification.)
04:12:28	18	BY MS. HAYRAPETIAN:
04:12:28	19	Q I just handed you that paper.
04:12:30	20	A Thank you. I appreciate it.
04:12:32	21	Q Okay. So this exhibit is an Instagram post,
04:12:39	22	and it's a joint posting of yours, Ceasar McDowell,
04:12:44	23	Instagram account and Unite the People Instagram
04:12:46	24	account, which as you know, running dual accounts, you
04:12:50	25	have to approve through both accounts to get it posted

		,
04:12:53	1	on two separate accounts
04:12:55	2	A Do you?
04:12:55	3	Q that's one post. Yes.
04:12:56	4	A I didn't know.
04:12:57	5	Q Okay. So so this joint posting includes a
04:13:04	6	screenshot of a press release which is titled, "Unite
04:13:10	7	the People Inc. CEO Ceasar McDowell Sets The Record
04:13:14	8	Straight On The Deposition, In RE Tory Lanez."
04:13:18	9	[As read] Lately, I haven't been responding to
04:13:21	10	all the rhetoric in the media. And then you go on,
04:13:25	11	Megan Thee Stallion's lawyers continue to try to and
04:13:29	12	give the appearance their case against Milagro Cooper is
04:13:32	13	successfully progressing by giving their, quote,
04:13:35	14	supposed mouthpiece Meghann Cuniff and all other persons
04:13:39	15	media or non-media wrong information.
04:13:42	16	And then you go on to explain that Tory Lanez
04:13:44	17	is not a party to Megan Thee Stallion's lawsuit against
04:13:47	18	UTP client Milagro Cooper, and, therefore, you UTP is
04:13:50	19	not obligated to produce Tory Lanez for a deposition,
04:13:53	20	nor did UTP agree or disagree to the deposition of
04:13:57	21	Mr. Lanez or any other potential witness. By law,
04:14:01	22	Megan's lawyers can depose any person they believe
04:14:04	23	possesses useful information to their case. To imply
04:14:07	24	UTP is going along with Megan's wishes or somehow is
04:14:11	25	being manipulated into going along is simply wrong, as

04:14:14	1	everything else Ms. Cuniff and others have said.
04:14:17	2	Despite her efforts to show she's the most useful of
04:14:20	3	ignorant tools to Megan's counsel, she is repeatedly
04:14:24	4	wrong about what is really happening in this case.
04:14:26	5	Lastly, if you know Tory Lanez how I do, good
04:14:30	6	luck trying to get him to testify to anything. It's
04:14:34	7	just not what he does, and he definitely did not agree
04:14:37	8	to testify now. Ceasar McDowell, CEO, Unite the People
04:14:42	9	Inc.
04:14:45	10	Do you recall that?
04:14:47	11	A I see it on the paper, you are talking about?
04:14:49	12	Q Uh-huh.
04:14:50	13	A I see it on the paper.
04:14:51	14	Q Yep. And the the caption says, "From
04:14:54	15	Ceasar McDowell, Regarding Tory Lanez' Deposition
04:14:56	16	Rumors."
04:14:57	17	That's a statement you wrote; right?
04:15:01	18	A The caption said what?
04:15:02	19	Q From Ceasar McDowell, regarding Tory Lanez'
04:15:05	20	deposition rumors.
04:15:09	21	A I don't see that.
04:15:11	22	Q Okay. Look at mid-lower page.
04:15:18	23	A Are you talking about right here?
04:15:20	24	Q No. A little lower.
04:15:21	25	Right there. The one sentence. Here.

04:15:27	1	A It says, "@ceasarmcdowell," not from
04:15:31	2	Ceasar McDowell.
04:15:32	3	Q No. It says, "From @ceasarmcdowell regarding
04:15:33	4	hashtag"
04:15:35	5	A Yeah, yeah. It does say, "From @ceasar," but
04:15:36	6	I didn't see that. Excuse me.
04:15:37	7	Q Okay.
04:15:37	8	A I'm not on social media. I'm a regular guy.
04:15:40	9	Q Okay. But this is a statement you wrote?
04:15:44	10	A I don't know who wrote it.
04:15:45	11	Q Okay. Well, it has your name on it; so you
04:15:47	12	approved it; right?
04:15:48	13	A I don't know.
04:15:48	14	Q You don't know if you approved a really bold
04:15:51	15	statement posted both from your Instagram account and
04:15:55	16	Unite the People, has your name up top in the
04:15:57	17	screenshot, has your name on the bottom.
04:15:59	18	Oh, wow. And, look, it has your verified
04:16:03	19	Instagram account commenting on the same post.
04:16:05	20	A Does it?
04:16:06	21	Q Is that you?
04:16:07	22	MR. HAYDEN: Objection. Argumentative.
04:16:08	23	THE WITNESS: Well, I don't know just
04:16:10	24	'cause you raised your voice, don't making it true.
04:16:12	25	I've learned that.

04:16:13	1	BY MS. HAYRAPETIAN:
04:16:13	2	Q Actually, I don't think I raised my voice.
04:16:15	3	A I do. But I'm just saying my opinion. My
04:16:16	4	opinion and your opinion might be different.
04:16:18	5	But I don't I see where it says,
04:16:19	6	"Ceasar McDowell." I see where it says,
04:16:22	7	"Meghann Cuniff." I see where it says, "Tory's
04:16:25	8	lawyers." So what?
04:16:26	9	Q Okay. This is a statement you made; correct?
04:16:30	10	A I don't recall.
04:16:30	11	Q Okay. It's a statement you signed off on;
04:16:32	12	right?
04:16:33	13	A I don't recall.
04:16:33	14	Q Actually, seems kind of ironic because you are
04:16:37	15	kind of doing the same thing today; right?
04:16:39	16	A What is that?
04:16:40	17	Q Your "Good luck trying to get him to testify
04:16:42	18	to anything."
04:16:43	19	MR. HAYDEN: Objection. Speculation.
04:16:44	20	BY MS. HAYRAPETIAN:
04:16:45	21	Q You've stated numerous times today that you
04:16:47	22	are not going to tell me anything.
04:16:50	23	A I don't know nothing to tell you. I don't
04:16:51	24	recall.
04:16:52	25	Q Why is UTP making public statements about

04.17.00	1	Torrila deposition in Ma Cooperla acao
04:17:02	1	Tory's deposition in Ms. Cooper's case?
04:17:05	2	A I don't recall.
04:17:06	3	Q Did Tory ask you to issue this press release?
04:17:10	4	MR. HAYDEN: Objection. Speculation. Lacks
04:17:11	5	foundation.
04:17:14	6	THE WITNESS: I don't recall.
04:17:14	7	BY MS. HAYRAPETIAN:
04:17:15	8	Q Tory told you ahead of time he wasn't going to
04:17:17	9	cooperate with his deposition, didn't he?
04:17:19	10	MR. HAYDEN: Objection. Speculation. Lacks
04:17:20	11	foundation.
04:17:21	12	THE WITNESS: I don't recall.
04:17:21	13	BY MS. HAYRAPETIAN:
04:17:22	14	Q You knew Tory was planning to refuse to answer
04:17:25	15	questions; correct?
04:17:25	16	MR. HAYDEN: Same objections.
04:17:27	17	THE WITNESS: I don't recall.
04:17:27	18	BY MS. HAYRAPETIAN:
04:17:28	19	Q But you didn't warn Ms. Pete's lawyers, did
04:17:30	20	you?
04:17:31	21	MR. HAYDEN: Same objections.
04:17:32	22	THE WITNESS: I don't recall.
04:17:33	23	Who is Ms. Pete?
04:17:34	24	BY MS. HAYRAPETIAN:
04:17:35	25	Q Instead you issued a press

04:17:38	1	A Who is Ms. Pete? I asked a question. You are
04:17:39	2	not going to tell me. Okay. Go ahead.
04:17:42	3	Q Sir.
04:17:42	4	A I don't know who Ms. Pete is.
04:17:43	5	Q You are being disruptive because that's the
04:17:45	6	eighth time you asked me who Ms. Pete is. And you know
04:17:48	7	well, that both in the admonitions in my the
04:17:51	8	beginning of my deposition and throughout the
04:17:53	9	deposition, we have repeatedly answered and clarified
04:17:55	10	who Ms. Pete is Megan Pete, Megan Thee Stallion.
04:17:59	11	
		A I forgot. I'm sorry.
04:18:00	12	Q Instead, you issued a press release supporting
04:18:05	13	Tory's non-cooperation; correct?
04:18:08	14	A I don't recall.
04:18:10	15	Q UTP doesn't normally issue press releases
04:18:16	16	about depositions, do they?
04:18:18	17	A I don't know.
04:18:19	18	Q You made an exception for Tory, didn't you?
04:18:25	19	A I don't know.
04:18:26	20	MR. HAYDEN: Objection. Speculation.
04:18:26	21	BY MS. HAYRAPETIAN:
04:18:27	22	Q This shows Tory uses UTP to shape public
04:18:29	23	opinion, doesn't it?
04:18:30	24	MR. HAYDEN: Objection. Speculation.
04:18:32	25	THE WITNESS: No. I don't know nothing about

04:18:33	1	that.
04:18:34	2	BY MS. HAYRAPETIAN:
04:18:34	3	Q What information did you communicate to
04:18:38	4	Ms. Cooper about Tory's deposition?
04:18:40	5	A That's that's the question?
04:18:47	6	Q Sure.
04:18:50	7	A What was it again? Say it again.
04:18:52	8	Q What information did you communicate to
04:18:54	9	Ms. Cooper about Tory's deposition?
04:18:56	10	A Can you read that back to me?
04:19:01	11	MS. HAYRAPETIAN: Go ahead. I don't think he
04:19:02	12	likes my voice anymore.
04:19:03	13	(The following record was read:
04:19:03	14	"QUESTION: What information did you
04:19:03	15	communicate to Ms. Cooper about Tory's
04:19:03	16	deposition?")
04:19:12	17	THE WITNESS: I don't recall ever
04:19:13	18	communicating anything to Ms. Cooper about anything.
04:19:15	19	BY MS. HAYRAPETIAN:
04:19:16	20	Q Okay.
04:19:19	21	MS. HAYRAPETIAN: Okay. Let's mark as
04:19:20	22	Exhibit 102, and if we can please pull up Tab 19 A-2,
04:19:26	23	which will be Exhibit 101 sorry 102-A, and the
04:19:31	24	transcript will be 102-B.
04:20:05	25	STENO TECH: Play the exhibit, Counsel?

04:20:06	1	MS. HAYRAPETIAN: Yes. We can play, please.
04:20:09	2	(Exhibit 102-A was marked for identification.)
04:20:09	3	(Exhibit 102-B was marked for identification.)
04:20:09	4	(A video clip was played.)
04:21:25	5	BY MS. HAYRAPETIAN:
04:21:27	6	Q This is from Ms. Cooper's live stream on
04:21:30	7	April 15, 2025, right after Tory's deposition had been
04:21:34	8	terminated for his misconduct. Ms. Cooper is referring
04:21:37	9	to the press release you put out there before Tory's
04:21:40	10	deposition that Tory would not cooperate with his
04:21:43	11	deposition; correct?
04:21:45	12	A I don't recall.
04:21:46	13	Q You spoke to Tory before his deposition;
04:21:49	14	correct?
04:21:51	15	A I don't recall speaking to him ever.
04:21:53	16	Q You told Tory not to cooperate; correct?
04:21:55	17	MR. HAYDEN: Objection. Speculation. Lacks
04:21:56	18	foundation.
04:21:58	19	THE WITNESS: I ain't never tell nobody
04:22:00	20	nothing.
04:22:00	21	Who is Mrs. Henderson? You don't know? You
04:22:11	22	don't remember?
04:22:11	23	BY MS. HAYRAPETIAN:
04:22:13	24	Q Mrs. Henderson is another attorney at our
04:22:15	25	firm.

04:22:16	1	A Okay. Thank you.
04:22:20	2	MS. HAYRAPETIAN: Let's mark as Exhibit 103,
04:22:23	3	Tab 19 A-1, and the transcript will be B.
04:22:46	4	And if we can play 19 A-1 whenever you are ready.
04:22:50	5	(Exhibit 103-A was marked for identification.)
04:22:50	6	(Exhibit 103-B was marked for identification.)
04:22:51	7	(A video clip was played.)
04:23:32	8	BY MS. HAYRAPETIAN:
04:23:33	9	Q So we just heard Ms. Cooper's continuation of
04:23:40	10	the live, and she's asserting that people are jealous of
04:23:45	11	her because of her proximity and close relationship with
04:23:48	12	Tory; right?
04:23:50	13	MR. HAYDEN: Objection. Speculation. Lacks
04:23:51	14	foundation.
04:23:54	15	THE WITNESS: I don't know what she's saying.
04:23:55	16	I don't you'd have to ask her. I don't know.
04:23:58	17	BY MS. HAYRAPETIAN:
04:23:59	18	Q Well, we just listened together.
04:24:00	19	A That means you know.
04:24:01	20	Q "Some people who have some feelings about my
04:24:03	21	proximity to Daystar."
04:24:07	22	A And?
04:24:08	23	Q You understand Ms. Cooper to be asserting that
04:24:11	24	people are also jealous about her special relationship
04:24:13	25	with Tory; right?

04:24:15	1	A I don't know.
04:24:19	2	Q And Tory's dad where she says, "Tory daddy
04:24:23	3	love me. I think," quote "I think people feel a way
04:24:27	4	about the fact that Tory daddy loves me," unquote.
04:24:33	5	MR. HAYDEN: Same objections.
04:24:33	6	BY MS. HAYRAPETIAN:
04:24:34	7	Q Did you hear that?
04:24:35	8	A I see it on the paper. I don't know what it
04:24:38	9	means.
04:24:38	10	What does it mean?
04:24:40	11	Q Did you supply Ms. Cooper with any information
04:24:43	12	concerning Tory's conduct at his deposition?
04:24:46	13	MR. HAYDEN: Objection. Speculation. Lacks
04:24:47	14	foundation.
04:24:48	15	THE WITNESS: I don't know nothing about that.
04:24:49	16	BY MS. HAYRAPETIAN:
04:24:50	17	Q So despite Ms. Cooper publicly declaring how
04:24:58	18	much Tory and Tory's dad love her, and the fact that she
04:25:02	19	suddenly also became your client after Tory is your
04:25:04	20	client, you are saying you don't know anything about
04:25:08	21	that?
04:25:09	22	A Well, we have a lot of clients that became our
04:25:10	23	client after Tory became our client. I know that. But
04:25:14	24	I don't know anything about you should ask her. You
04:25:16	25	said you got her name on it.

04:25:18	1	Q	So give me another example of a client you got
04:25:20	2	because of	Tory? You just said you have a lot.
04:25:26	3	А	I got a lot of clients after Tory. I didn't
04:25:27	4	say anythi	ng about a client that I got because of Tory.
04:25:30	5	Q	Well, we're talking specifically about
04:25:33	6	Milagro Co	ooper
04:25:35	7	А	Uh-huh.
04:25:35	8	Q	being your client
04:25:37	9	А	Uh-huh.
04:25:37	10	Q	because Tory and her Tory's dad love her
04:25:40	11	so much.	
04:25:42	12	А	Then you should specifically ask her.
04:25:45	13		MS. DIXON: Objection. Calls for speculation.
04:25:46	14		MR. HAYDEN: Objection.
04:25:47	15	BY MS. HAY	RAPETIAN:
04:25:48	16	Q	So even with how much Tory, your client, and
04:25:54	17	someone yo	ou talk to 97 times in a few months?
04:25:58	18	А	Who did I talk to 97 times?
04:26:00	19	Q	Tory.
04:26:00	20	А	Okay.
04:26:01	21	Q	Ms. Cooper is talking about how the person you
04:26:08	22	talked to	frequently loves her so much, and you are
04:26:10	23	telling me	e you don't share information about each
04:26:14	24	other's ca	ases?
04:26:16	25		MR. HAYDEN: Objection. Speculation.

04:26:17	1	THE WITNESS: You said that somebody that I
04:26:20	2	talk to frequently. I talk to his daddy frequently.
04:26:24	3	BY MS. HAYRAPETIAN:
04:26:25	4	Q Tory. I'm talking about Tory.
04:26:26	5	A I thought you said, "Tory daddy loves me."
04:26:28	6	Now you are saying that he loves her.
04:26:29	7	Who loves who?
04:26:30	8	Q Everyone loves everyone.
04:26:31	9	A Okay. I love you too.
04:26:37	10	Q Okay. Are you telling me Tory never told you
04:26:43	11	to relay information to Ms. Cooper about his deposition
04:26:45	12	in her cases?
04:26:46	13	A Tory has never told me nothing about nothing.
04:26:51	14	I don't remember him telling me nothing ever.
04:26:55	15	Q What does that mean nothing about nothing?
04:26:57	16	A I don't know. I don't remember.
04:26:59	17	Q Okay. But you remember that he told you
04:27:01	18	nothing about nothing?
04:27:02	19	MR. HAYDEN: Objection. Vague and ambiguous.
04:27:03	20	Argumentative.
04:27:06	21	THE WITNESS: I don't remember.
04:27:06	22	BY MS. HAYRAPETIAN:
04:27:07	23	Q On May 14, 2025, UTP held a press conference
04:27:13	24	accusing Roc Nation of trying to have Tory Lanez killed
04:27:16	25	in prison to prevent the truth from coming out and

04:27:22	1	exposing Ms. Pete as a purported perjurer.
04:27:27	2	Do you recall that?
04:27:29	3	A Can I answer? Can I answer that?
04:27:32	4	Q Uh-huh.
04:27:32	5	A Okay. You just said a whole lot of things
04:27:35	б	that were wrong. You said Unite the People held a press
04:27:39	7	conference that Unite the People said that Roc Nation
04:27:44	8	what did you say Roc Nation was supposed to try to kill
04:27:47	9	him.
04:27:48	10	What did you say?
04:27:49	11	Q Do you disagree that Unite the People held a
04:27:51	12	press conference accusing Roc Nation of trying to have
04:27:54	13	Tory Lanez killed in prison?
04:27:55	14	A I 1,000 percent know that Unite the People
04:27:58	15	none of Unite the People staff has ever said that
04:28:02	16	Roc Nation was trying to kill Tory Lanez in prison.
04:28:06	17	Q Okay. Let's take a look.
04:28:07	18	A Let's take a look.
04:28:08	19	MS. DIXON: Objection as to relevance. It's
04:28:10	20	not during the time period of this lawsuit. Your
04:28:12	21	lawsuit was October 24th or somewhere in 2024.
04:28:16	22	That's when it started. This is after the pendency of
04:28:20	23	the lawsuit, and none of the allegations in your
04:28:21	24	complaint are covered by this activity.
04:28:26	25	MS. HAYRAPETIAN: Okay. Exhibit 104. Can we

04:28:30	1	please pull up Tab 52-A-1?
04:28:34	2	MS. DIXON: It's not relevant. Objection.
04:28:35	3	I can't even see it.
04:28:45	4	MS. HAYRAPETIAN: And can we please raise the
04:28:51	5	volume?
04:29:03	6	Okay. I think we are ready to play.
04:29:04	7	(Exhibit 104-A was marked for identification.)
04:29:04	8	(Exhibit 104-B was marked for identification.)
04:29:20	9	(A video clip was played.)
04:29:21	10	BY MS. HAYRAPETIAN:
04:29:22	11	Q Okay. This is Walter Roberts from Unite the
04:29:23	12	People; right?
04:29:24	13	A That's him.
04:29:26	14	Q Okay. And what is his role at Unite the
04:29:32	15	People? Is he a lawyer?
04:29:35	16	A He is an employee.
04:29:36	17	Q Employee of what kind of employee would you
04:29:38	18	classify him as?
04:29:39	19	A One of the ones we pay. He is an employee.
04:29:42	20	Q Okay. And when he introduced himself at this
04:29:45	21	press conference, he called himself a "legal
04:29:47	22	consultant."
04:29:48	23	What does that mean?
04:29:48	24	A Oh, that that must mean he is a legal
04:29:50	25	consultant.

04:29:51	1	Q Okay. What does that mean?
04:29:53	2	A That he consults legally.
04:29:57	3	Q What is Mr. Robert's involvement in Tory's
04:30:01	4	criminal case?
04:30:07	5	A He must be consulted legally, you just said.
04:30:10	6	Q What work did Mr. Roberts do on Tory's
04:30:14	7	criminal case?
04:30:15	8	A You'd have to ask him. I don't know.
04:30:17	9	Q As the CEO of Unite the People, you don't know
04:30:20	10	what work your employee did on a case?
04:30:23	11	A No. Does your employer know every work you do
04:30:26	12	on every case?
04:30:27	13	Q What is Mr. Roberts' involvement with this
04:30:30	14	civil lawsuit?
04:30:34	15	A I couldn't possibly know.
04:30:35	16	Q He doesn't work on Ms. Cooper's case?
04:30:36	17	A I couldn't possibly know.
04:30:38	18	Q Okay. Before the press conference, did you
04:30:40	19	know Mr. Roberts was going to accuse Roc Nation and
04:30:43	20	Ms. Pete of being involved in Tory's stabbing?
04:30:46	21	MR. HAYDEN: Objection. Speculation. Lacks
04:30:47	22	foundation.
04:30:50	23	MS. HAYRAPETIAN: Actually, guys, the
04:30:51	24	foundation is set. So we're looking at a statement from
04:30:54	25	Walter Roberts, quote, "The only party that responded

04:30:58	1	was last week, was Megan Pete's representatives with a
04:31:02	2	request for more information. A few days later,
04:31:04	3	Mr. Peterson is brutally attacked in a jail cell."
04:31:07	4	MR. HAYDEN: Okay. Objection. Speculation.
04:31:09	5	MS. DIXON: Objection. It's also outside of
04:31:10	6	the scope of your complaint.
04:31:13	7	BY MS. HAYRAPETIAN:
04:31:14	8	Q Did you approve Mr. Robert's statement
04:31:16	9	before he made it?
04:31:18	10	MS. DIXON: Objection. Relevance.
04:31:20	11	THE WITNESS: Now, you are asking a couple
04:31:21	12	different questions. The original question that you
04:31:23	13	asked me was, did Unite the People's staff say that
04:31:28	14	Roc Nation tried to kill Tory Lanez. And from what the
04:31:30	15	video you just showed me and the piece of paper you are
04:31:33	16	putting in front of me, nowhere on here does it say
04:31:36	17	anything about Unite the People saying Roc Nation tried
04:31:40	18	to kill Tory Lanez.
04:31:41	19	BY MS. HAYRAPETIAN:
04:31:41	20	Q Okay. So let's take it one by one.
04:31:43	21	A Let's do it.
04:31:44	22	Q What does it say. Can you tell me what it
04:31:46	23	says?
04:31:46	24	A "The."
04:31:47	25	Q Okay.

04:31:48	1	A "Later." There's a word "request." That's a
04:31:51	2	lot.
04:31:52	3	Q No. It says, "The only party that responded
04:31:56	4	was Megan Pete's representatives."
04:31:57	5	And what does that mean to you Megan Pete's
04:32:00	6	representatives?
04:32:01	7	A It doesn't mean Roc Nation is trying to kill
04:32:03	8	Tory Lanez. I don't see that nowhere. I don't see
04:32:06	9	Unite the People staff saying that. I I see what you
04:32:08	10	said right here, and what he said right there. And not
04:32:11	11	at one point, did he say Roc Nation's attorneys, or
04:32:15	12	whoever else, tried to kill Tory Lanez in prison.
04:32:20	13	Q Okay.
04:32:20	14	A I don't know what you see on them three lines,
04:32:22	15	but I don't see that.
04:32:23	16	Q Sure. And then it says, "A few days later
04:32:25	17	Mr. Peterson is brutally attacked in a jail cell";
04:32:28	18	so
04:32:28	19	A I don't see it saying by Roc Nation or their
04:32:30	20	lawyers.
04:32:30	21	Q Well, it says, "Megan Pete's representatives."
04:32:33	22	A It says, "Megan Pete's representatives
04:32:35	23	attacked him in his jail cell"?
04:32:38	24	Q It says it makes an inference that
04:32:39	25	A No, it didn't.

04:32:40	1	Q So do you disagree that these two sentences
04:32:44	2	stated back-to-back makes an inference that
04:32:47	3	A 100 percent.
04:32:47	4	Q Okay.
04:32:48	5	MR. HAYDEN: And I'm going to object to
04:32:50	6	speculation again.
04:32:53	7	MS. HAYRAPETIAN: Marking as Exhibit 105, and
04:33:00	8	if we can pull 52 A-2 which will be Exhibit 104-A and
04:33:05	9	the transcript will be 104-B sorry 105-B.
04:33:10	10	And if we can also raise the volume.
04:33:36	11	(Exhibit 105-A was marked for identification.)
04:33:36	12	(Exhibit 105-B was marked for identification.)
04:33:36	13	(A video clip was played.)
04:33:51	14	STENO TECH: I have it at max volume, Counsel,
04:33:52	15	but I'll see what I can do.
04:34:24	16	BY MS. HAYRAPETIAN:
04:34:24	17	Q This is Gianno Caldwell?
04:34:27	18	A Is that a question to me?
04:34:29	19	Q Yeah.
04:34:30	20	A Yes.
04:34:30	21	Q Okay. And how do you know Gianno Caldwell?
04:34:36	22	A I think he is a Fox commentator on TV or
04:34:39	23	something.
04:34:43	24	Q And what's his affiliation with UTP?
04:34:45	25	A Nothing at all.

04 04 45	_	
04:34:45	1	Q He just came and spoke at your press
04:34:47	2	conference?
04:34:48	3	A Yes.
04:34:49	4	Q Is that because you are affiliated with the
04:34:51	5	Republican Party?
04:34:53	6	MR. HAYDEN: Objection. Relevance.
04:34:54	7	THE WITNESS: The Republican Party? I don't
04:34:57	8	know nothing about any of that.
04:35:00	9	BY MS. HAYRAPETIAN:
04:35:00	10	Q You are not interested in politics?
04:35:03	11	A Prison politics.
04:35:03	12	Q What does that mean?
04:35:05	13	A I don't know.
04:35:07	14	Q You are not interested in global politics?
04:35:11	15	A I don't remember anything about global
04:35:13	16	politics.
04:35:13	17	What type of politics are in the global?
04:35:16	18	Q Political relations within the United States.
04:35:18	19	Is that not a topic that is of, you know,
04:35:22	20	primary importance to you?
04:35:23	21	A I don't know. I don't remember any topics
04:35:26	22	that are primary importance to me.
04:35:28	23	Q Okay. When did you first meet Mr. Caldwell?
04:35:32	24	A I don't remember.
04:35:37	25	Q What is Mr. Caldwell's involvement with

04:35:39	1	Tory's criminal case?
04:35:41	2	A I don't remember. I just told you I don't
04:35:44	3	know Gianno Caldwell. He is a Fox commentator.
04:35:48	4	Q But he is speaking at your press conference?
04:35:50	5	MS. DIXON: Objection. That assumes facts not
04:35:51	6	in evidence.
04:35:52	7	THE WITNESS: Yeah. I don't know.
04:35:52	8	BY MS. HAYRAPETIAN:
04:35:53	9	Q Before the press conference, did you know
04:35:59	10	Mr. Caldwell was going to insinuate Roc Nation, and
04:36:02	11	Ms. Pete, of being involved in Tory's stabbing?
04:36:04	12	MR. HAYDEN: Objection. Speculation.
04:36:06	13	THE WITNESS: I don't remember nothing like
04:36:07	14	that.
04:36:07	15	BY MS. HAYRAPETIAN:
04:36:08	16	Q You didn't ask him to share his view points
04:36:10	17	before you invited him to speak at your press
04:36:12	18	conference?
04:36:13	19	MR. HAYDEN: Objection. Speculation.
04:36:14	20	Argumentative.
04:36:15	21	THE WITNESS: Who said I invited him?
04:36:16	22	BY MS. HAYRAPETIAN:
04:36:16	23	Q How did he end up at your press conference?
04:36:19	24	A I don't know. But you just said I invited
04:36:21	25	him. I told you that I don't know him.

04:36:23	1	Q Okay. Well, you let him speak at your press
04:36:25	2	conference; right?
04:36:28	3	A I don't remember who let him. He spoke.
04:36:31	4	Q Well, you hosted the press conference;
04:36:32	5	correct?
04:36:33	6	A Yes.
04:36:34	7	Q Okay. So, as a host, you gave him a platform
04:36:38	8	to speak; right?
04:36:40	9	A Uh-huh. No.
04:36:41	10	Q Okay. So he just showed up there and spoke
04:36:43	11	without knowing what was happening that day, where it
04:36:47	12	was, what it was about? And he started speaking, and
04:36:50	13	you allowed him to continue; is that correct?
04:36:53	14	A I don't really remember how it happened. I
04:36:59	15	know he spoke there, though. You can clearly see it on
04:37:01	16	the video. Handsome young man, spoke very clearly, but
04:37:04	17	I don't know who allowed him or anything about him.
04:37:10	18	Q Did you approve his statements?
04:37:13	19	A I don't even remember his statements. I had
04:37:17	20	nothing to do with his statements.
04:37:20	21	Q Okay. Did you or anyone at UTP pay
04:37:21	22	Mr. Caldwell to make the statements he made during
04:37:25	23	your press conference?
04:37:26	24	MR. HAYDEN: Objection. Speculation.
04:37:27	25	THE WITNESS: Not at all.

04:37:31	1	MS. HAYRAPETIAN: Let's mark as Exhibit
04:37:32	2	Number 106, Tab 52 A-3. And, again, the video clip will
04:37:43	3	be A, and B will be the transcript.
04:38:43	4	(Exhibit 106-A was marked for identification.)
04:38:43	5	(Exhibit 106-B was marked for identification.)
04:38:44	6	(A video clip was played.)
04:38:44	7	BY MS. HAYRAPETIAN:
04:38:44	8	Q Who is that?
04:38:46	9	A Are you asking me?
04:38:47	10	Q Yeah.
04:38:47	11	A Who that is?
04:38:48	12	Q Yeah.
04:38:48	13	A What did it say under there? Did it say who
04:38:50	14	she was?
04:38:51	15	Q I'm not sure.
04:38:52	16	A I didn't see it. I didn't see it.
04:38:53	17	Q Do you recognize her?
04:38:55	18	A That paper are you talking about the lady
04:38:58	19	in the front?
04:38:59	20	Q Correct. The one speaking in front of
04:39:01	21	Mr. Hayden.
04:39:02	22	A I don't know who is speaking. But the lady in
04:39:03	23	the front, I met her before. I don't really know her.
04:39:08	24	Q When did you meet her?
04:39:10	25	A I don't remember.

04:39:11	1	Q Okay. So that's Diana London.
04:39:14	2	A Is it?
04:39:14	3	Q Does that sound familiar?
04:39:15	4	A Might be.
04:39:16	5	MS. DIXON: Objection. Relevance to this
04:39:17	6	case, to the complaint. It is irrelevant to any of the
04:39:22	7	facts in your complaint of October of 2024.
04:39:25	8	MS. HAYRAPETIAN: Counsel, please stop with
04:39:26	9	the speaking objections. Relevance is not an
04:39:29	10	appropriate objection.
04:39:30	11	MS. DIXON: It actually is.
04:39:32	12	MS. HAYRAPETIAN: It is not.
04:39:32	13	MS. DIXON: You are assuming the scope of your
04:39:33	14	own
04:39:34	15	MS. HAYRAPETIAN: And if you continue to
04:39:35	16	interrupt
04:39:36	17	MS. DIXON: What are you going to do if I
04:39:37	18	continue?
04:39:38	19	MS. HAYRAPETIAN: If you continue to interrupt
04:39:40	20	my questioning and other people's questioning throughout
04:39:42	21	this litigation, we are going to have to go to the court
04:39:45	22	and the magistrate and ask for an order to only allow
04:39:53	23	for form objections.
04:39:54	24	MS. DIXON: Okay. I'm objecting to form
04:39:56	25	because your question is compound, ambiguous

04:39:57	1	MS. HAYRAPETIAN: Great. Great.
04:39:58	2	MS. DIXON: irrelevant.
04:39:59	3	MS. HAYRAPETIAN: Object. Form. Period is
04:40:00	4	enough. Stop interrupting my questioning and
04:40:03	5	continually coaching this witness. Who is not even your
04:40:07	6	client, by the way.
04:40:08	7	MS. DIXON: I'm not coaching the witness. I'm
04:40:09	8	making objections.
04:40:11	9	MS. HAYRAPETIAN: Okay. That's not a proper
04:40:12	10	objection. Please stop interrupting me.
04:40:15	11	MS. DIXON: Please stop telling me what I'm
04:40:17	12	doing when I'm not coaching the witness, and I wouldn't.
04:40:19	13	BY MS. HAYRAPETIAN:
04:40:20	14	Q So Diana London is speaking at the press
04:40:23	15	conference you are hosting; correct?
04:40:25	16	A Yes.
04:40:26	17	Q Okay. And she is saying Tory was stabbed 14
04:40:33	18	times, and she's pointing out that this was after
04:40:36	19	two years in prison without incident. And then she
04:40:39	20	says, "It was just days after a major news outlet
04:40:43	21	reached out to Megan Pete's team, Kelsey Harris and
04:40:47	22	former DA, George Gascon about a story on new evidence
04:40:51	23	in this case."
04:40:52	24	And looking at your employee, Walter Roberts,
04:40:57	25	employee of Unite the People, legal consultant, he says,

04:40:59	1	"The only party that responded was last week was Megan
04:41:04	2	Pete's representatives."
04:41:05	3	Coming back to Diana London's statement, she
04:41:09	4	says, "You don't have to believe in conspiracy theories
04:41:11	5	to see the pattern. When evidence was about to come to
04:41:16	6	light, Tory was nearly killed. So let's stop pretending
04:41:20	7	this is complicated."
04:41:21	8	You agree she is saying, as Walter Roberts
04:41:31	9	inferred, Megan Pete's representatives nearly killed
04:41:36	10	Tory after a national news outlet reached out to her
04:41:41	11	team; right?
04:41:42	12	MR. HAYDEN: Objection. Speculation.
04:41:43	13	Compound.
04:41:44	14	THE WITNESS: No. I agree that you're
04:41:46	15	absolutely wrong.
04:41:46	16	Again, Walter Roberts, who is an employee of
04:41:50	17	Unite the People, said nothing about Roc Nation's
04:41:53	18	lawyers stabbing Tory Lanez in prison. It's two
04:41:56	19	sentences right there that I'm reading, ma'am. I don't
04:41:58	20	see that.
04:41:59	21	Now, Diana London, what she said or
04:42:02	22	inferred I don't know. You would have to ask her.
04:42:05	23	BY MS. HAYRAPETIAN:
04:42:06	24	Q This is at a press conference you hosted, you
04:42:12	25	commenced, you were the opening speaker, and you have at

04:42:16	1	least three people pointing the finger at Megan Pete,
04:42:21	2	and her representatives. And any reasonable person,
04:42:28	3	after they watched your press conference, would assume
04:42:31	4	you are accusing Megan Pete and her representatives of
04:42:35	5	killing Tory Lanez; correct?
04:42:37	6	MR. HAYDEN: Same objections.
04:42:39	7	THE WITNESS: Well, I don't think Tory Lanez
04:42:40	8	has been killed, but you just said he was.
04:42:42	9	But, no, you are not correct. Any reasonable
04:42:45	10	person would know that Walter Roberts was introduced,
04:42:50	11	like you said, as the senior consultant and I think the
04:42:53	12	other two people were not.
04:42:54	13	So, no, I don't think any reasonable person
04:42:56	14	would possibly think that. I think it's a reach that
04:42:59	15	you are trying for.
04:43:00	16	BY MS. HAYRAPETIAN:
04:43:00	17	Q I'm sorry. So what does Robert Robert
04:43:10	18	being a senior consultant, and the other two people not
04:43:13	19	being senior consultants how does that translate into
04:43:18	20	a reasonable reasonable people not thinking that
04:43:22	21	they're accusing Megan Pete and her representatives of
04:43:26	22	nearly killing Tory Lanez?
04:43:27	23	MS. DIXON: Objection to form.
04:43:28	24	MR. HAYDEN: Objection to form. Compound.
04:43:30	25	BY MS. HAYRAPETIAN:

04:43:30	1	Q What's the logic. Explain that to me.
04:43:33	2	A The logic is, again, I don't know who Robert
04:43:36	3	Roberts is, what you just said, but this is
04:43:37	4	Walter Roberts. Walter Roberts is part of our staff.
04:43:39	5	Q Right.
04:43:40	6	A That's Unite the People.
04:43:41	7	Q Uh-huh.
04:43:42	8	A Said nothing about Roc Nation going
04:43:46	9	sneaking into prison and killing Tory Lanez or attempted
04:43:49	10	to kill him or whatever.
04:43:50	11	Now, you are insinuating that these people
04:43:53	12	did; so, if these people did, you would have to ask
04:43:56	13	them.
04:43:56	14	As far as Unite the People's staff goes, he
04:43:59	15	did not say that. That's what I'm saying.
04:44:02	16	Q Okay. Well, we all just heard and read what
04:44:04	17	all three people said at your press conference, within
04:44:08	18	minutes of each other.
04:44:15	19	MR. HAYDEN: Objection. No question asked.
04:44:23	20	BY MS. HAYRAPETIAN:
04:44:24	21	Q What is Diana London's affiliation with UTP?
04:44:34	22	A That was a question to me?
04:44:35	23	Q That was a question, yeah.
04:44:36	24	A I don't think there is any. I don't know.
04:44:39	25	You'd have to ask her if she I don't know anything

04:44:43	1	about her affiliations with Unite the People.
04:44:45	2	Q Okay.
04:44:46	3	MS. HAYRAPETIAN: Okay. Let's mark as
04:44:47	4	Exhibit 107, and could we, please, pull up Tab 45-A.
04:45:27	5	(Exhibit 107-A was marked for identification.)
04:45:27	6	(Exhibit 107-B was marked for identification.)
04:45:27	7	(A video clip was played.)
04:46:04	8	BY MS. HAYRAPETIAN:
04:46:05	9	Q So that's your client former client,
04:46:08	10	Milagro Cooper, watching your press conference on live
04:46:14	11	stream where she also streamed the entire press
04:46:17	12	conference; and immediately after, she is saying, "They
04:46:22	13	absolutely implicated Roc Nation in the, quote,
04:46:25	14	attempted murder of Daystar Peterson on national news."
04:46:30	15	That's what you saw. That is exactly what you saw.
04:46:33	16	Your client, Ms. Cooper, reasonable person; right?
04:46:37	17	A Is that a question for me?
04:46:38	18	MR. HAYDEN: Objection. Speculation.
04:46:39	19	BY MS. HAYRAPETIAN:
04:46:39	20	Q That is a question for you.
04:46:40	21	A I'm sorry. I didn't mean to overtalk you,
04:46:42	22	sir.
04:46:44	23	MS. DIXON: Objection. Relevance.
04:46:46	24	THE WITNESS: Okay. Well, what I just
04:46:48	25	heard again, I don't know what you heard. But when

04:46:52	1	she says they absolutely implicated and he absolutely
04:46:56	2	did that, at no point did she name Walter Roberts, who
04:47:00	3	is the staff of Unite the People, again, saying anything
04:47:04	4	about Roc Nation or killing anybody or attempting to
04:47:06	5	kill anybody or anything like that.
04:47:08	6	BY MS. HAYRAPETIAN:
04:47:09	7	Q Would you like me to pull the whole video so
04:47:10	8	we can watch everything she talks about?
04:47:13	9	A I wouldn't care what you pull. There's
04:47:15	10	nothing that Unite the People you are not going to be
04:47:17	11	able to dance around and stretch and say anybody on
04:47:20	12	Unite the People's staff said anything that Roc Nation
04:47:25	13	or their lawyers went into the prison and tried to stab
04:47:29	14	Tory Lanez or have him stabbed or whatever you want to
04:47:31	15	say. That's a reach. It was never said.
04:47:35	16	You can try to imply it all you want to. It
04:47:37	17	was never said.
04:47:41	18	Q Do you remember who introduced you to
04:47:42	19	Diana London?
04:47:44	20	A I don't remember.
04:47:45	21	Q Okay. Diana London calls herself a "fixer."
04:47:49	22	Did you know that?
04:47:49	23	A I don't know anything about that.
04:47:51	24	Q You hired Diana London to fix Tory's
04:47:53	25	situation; right?

	1	
04:47:55	1	MR. HAYDEN: Objection. Speculation.
04:47:57	2	THE WITNESS: Not at all.
04:47:58	3	MS. DIXON: Objection. Irrelevant to your
04:47:59	4	complaint.
04:48:00	5	BY MS. HAYRAPETIAN:
04:48:00	6	Q This was around the time that UTP decided they
04:48:03	7	no longer wanted to represent Ms. Cooper as a client;
04:48:05	8	correct?
04:48:07	9	A I just said not at all; so how could you say
04:48:10	10	that? I just said, "No."
04:48:12	11	Q You found a new fixer to replace Ms. Cooper;
04:48:15	12	right?
04:48:15	13	MR. HAYDEN: Objection. Speculation.
04:48:17	14	Argumentative. Lacks foundation.
04:48:19	15	THE WITNESS: I found a new fixer to fix
04:48:21	16	Cooper?
04:48:21	17	BY MS. HAYRAPETIAN:
04:48:22	18	Q You found a new fixer to replace Ms. Cooper.
04:48:27	19	A Uh-huh. I found a new fixer that don't
04:48:30	20	even make sense. That don't I found a new fixer to
04:48:33	21	fix Cooper to replace Cooper.
04:48:36	22	Cooper was my fixer?
04:48:39	23	Q That's right.
04:48:39	24	A Is that what you are saying?
04:48:41	25	Q Right.

04:48:41	1	MR. HAYDEN: Objection has been noted.
04:48:43	2	THE WITNESS: That's hilarious.
04:48:44	3	BY MS. HAYRAPETIAN:
04:48:45	4	Q Do you disagree?
04:48:47	5	A 100 percent.
04:48:48	6	Q Okay. How did you connect with the MAGA
04:48:53	7	figures Diana London and Congresswoman Luna?
04:48:59	8	A Who?
04:49:00	9	Q Congresswoman Luna, Anna Paulina Luna?
04:49:04	10	A Who is that? You said that I connected with
04:49:05	11	them?
04:49:06	12	Q You don't know who that is?
04:49:07	13	A Have you ever seen me talk to that who is
04:49:09	14	that? Luna? Congresswoman Luna?
04:49:11	15	Q Congresswoman
04:49:12	16	A You are saying that I talked to her?
04:49:13	17	Q I'm saying, how did you get connected to
04:49:16	18	Diana London?
04:49:18	19	A Who said I was connected? I'm trying to
04:49:18	20	figure out how I was connected. I don't know them.
04:49:18	21	Q Are you denying knowing?
04:49:20	22	A I 100 percent don't know her.
04:49:22	23	MS. DIXON: Objection. Relevance to this
04:49:23	24	complaint.
04:49:24	25	BY MS. HAYRAPETIAN:

04:49:24	1	Q Did you promise political support in exchange			
04:49:26	2	for the Republican Party's help with Tory?			
04:49:29	3	MR. HAYDEN: Objection. Speculation. Lacks			
04:49:30	4	foundation.			
04:49:31	5	THE WITNESS: Did I promise political not			
04:49:33	6	at all. To who? Who would I promise it to?			
04:49:36	7	BY MS. HAYRAPETIAN:			
04:49:37	8	Q Who are you been requesting to pardon Tory?			
04:49:41	9	MS. DIXON: Objection.			
04:49:42	10	THE WITNESS: I haven't.			
04:49:43	11	MS. DIXON: Irrelevant to this complaint.			
04:49:44	12	BY MS. HAYRAPETIAN:			
04:49:44	13	Q Did you pay Diana London to make these			
04:49:47	14	statements?			
04:49:48	15	MR. HAYDEN: Objection. Speculation.			
04:49:49	16	THE WITNESS: Not at all.			
04:49:50	17	BY MS. HAYRAPETIAN:			
04:49:50	18	Q Did anyone at UTP pay Diana London to make			
04:49:54	19	these statements?			
04:49:56	20	A Not at all.			
04:49:59	21	Q Did UTP have anything to do with the stabbing			
04:50:18	22	of Tory Lanez?			
04:50:20	23	MR. HAYDEN: Objection. Asked and answered.			
04:50:21	24	THE WITNESS: Did you? Don't ask me nothing			
04:50:25	25	dumb like that because I will respond dumb, "Did you."			

04:50:27	1	BY MS. HAYRAPETIAN:			
04:50:27	2	Q So are you accusing Megan Pete and her			
04:50:29	3	representatives			
04:50:31	4	A I don't know.			
04:50:31	5	MR. HAYDEN: Objection. Speculation.			
04:50:32	6	MS. HAYRAPETIAN: of being involved? Is			
04:50:33	7	hat what I just heard?			
04:50:35	8	A You just heard is it you. Why are you asking			
04:50:36	9	me did I stab Tory Lanez? What is wrong with you? Did			
04:50:38	10	you stab Tory Lanez? That's what I heard.			
04:50:40	11	Q That's not what I asked. That's not what I			
04:50:41	12	asked.			
04:50:41	13	A What did you say? Well, maybe I heard it			
04:50:43	14	wrong. I apologize if I'm wrong.			
04:50:45	15	MS. HAYRAPETIAN: I'm sure Ms. Court Reporter			
04:50:47	16	could read back the transcript.			
04:50:59	17	THE COURT REPORTER: What did you want me to			
04:51:00	18	read?			
04:51:00	19	MS. HAYRAPETIAN: My last question.			
04:51:00	20	(The following record was read:			
04:51:00	21	"QUESTION: Did UTP have anything to do			
04:51:00	22	with the stabbing of Tory Lanez?")			
04:51:00	23	THE WITNESS: And my reply to that was, "Did			
04:51:02	24	you."			
04:51:03	25	Why you asking me something stupid like that?			

04:51:05	1	If we don't get defensive, we won't get			
04:51:14	2	offensive. But come on now. Now, you getting			
04:51:17	3	disrespectful. I'll get up and walk on out of here.			
04:51:25	4	MR. HAYDEN: I would object to Fifth			
04:51:26	5	Amendment			
04:51:27	6	THE WITNESS: Matter fact, I'm about to go			
04:51:28	7	outside and smoke. You don't have a question right now.			
04:51:31	8	MR. HAYDEN: No need.			
04:51:36	9	MS. HAYRAPETIAN: I will take that			
04:51:38	10	THE WITNESS: You are going to ask me, did I			
04:51:40	11	have something to do with stabbing? What's wrong with			
04:51:42	12	you? You are sick.			
04:51:43	13	MS. HAYRAPETIAN: I will take			
04:51:43	14	THE WITNESS: You are you are sick in your			
04:51:44	15	head.			
04:51:45	16	MS. HAYRAPETIAN: I will take			
04:51:45	17	THE WITNESS: You really need to get it			
04:51:46	18	together.			
04:51:46	19	MS. HAYRAPETIAN: I will take			
04:51:46	20	THE WITNESS: You asked me something offensive			
04:51:49	21	like that. Did you have something to do with them			
04:51:51	22	stabbing him? What's wrong with you? Somebody got			
04:51:52	23	stabbed. If that was your friend or your family, would			
04:51:55	24	you be asking that dumbass question?			
04:51:58	25	MR. HAYDEN: Ceasar, you got to settle down,			

04:51:59	1	buddy. Come on.	
04:52:00	2	MS. HAYRAPETIAN: Let's	
04:52:03	3	MS. DIXON: I think it's discovery abuse	
04:52:04	4	because it's not in your complaint.	
04:52:06	5	THE COURT REPORTER: We're on the record.	
04:52:07	6	MS. HAYRAPETIAN: Let's go off the record.	
04:52:09	7	THE VIDEOGRAPHER: The time is 4:52 PM	
04:52:11	8	Pacific time. We are now off the record.	
04:52:15	9	(Recess was taken.)	
05:13:14	10	THE VIDEOGRAPHER: The time is 5:13 PM	
05:13:33	11	Pacific time. We are back on the record.	
05:13:34	12	BY MS. HAYRAPETIAN:	
05:13:35	13	Q Okay. We just took a quick break.	
05:13:42	14	Mr. McDowell, have you had a time to calm	
05:13:46	15	down and compose yourself?	
05:13:48	16	Okay. No answer.	
05:13:54	17	MS. HAYRAPETIAN: And I will just reflect for	
05:13:58	18	the record, because I'm not sure if it picked it up, but	
05:14:05	19	while a question was pending, the witness walked off,	
05:14:10	20	left the room, while he was still speaking, and he	
05:14:14	21	called me a a "Bitch" and asked what the fuck is	
05:14:26	22	wrong with me. And	
05:14:30	23	MR. HAYDEN: Wait, did he use that word?	
05:14:32	24	MS. HAYRAPETIAN: Yes. And people outside	
05:14:33	25	heard, and they asked if I wanted security called up;	

05:14:35	1	so			
05:14:38	2	MS. DIXON: Let's also let the record reflect			
05:14:41	3	the question that you asked just previous to that was			
05:14:43	4	whether or not he had anything to do with the stabbing			
05:14:45	5	of his friend, Daystar Peterson.			
05:14:47	6	MS. HAYRAPETIAN: I think the record is clear			
05:14:49	7	without Counsel's continued coaching and interruptions.			
05:14:52	8	MS. DIXON: That's not a coaching. It's a			
05:14:54	9	clarification of the record.			
05:14:55	10	MS. HAYRAPETIAN: And delaying the			
05:14:56	11	record the record does not need your clarification.			
05:14:57	12	Thank you very much.			
05:14:58	13	MS. DIXON: Well, you just gave your			
05:14:59	14	clarification, which it didn't need, because he was			
05:15:01	15	already still on the record.			
05:15:06	16	BY MS. HAYRAPETIAN:			
05:15:06	17	Q Okay. Moving on, was Walter Roberts an			
05:15:14	18	attorney at UTP at any point?			
05:15:17	19	A I don't remember.			
05:15:18	20	Q Okay.			
05:15:28	21	MS. HAYRAPETIAN: Let's take a look at Tab 46,			
05:15:34	22	please and mark it as Exhibit Number 108.			
05:15:42	23	BY MS. HAYRAPETIAN:			
05:15:42	24	Q Has Walter Roberts been working on			
05:15:47	25	Ms. Cooper's case?			

05:15:48	1	A I don't remember.			
05:15:56	2	MS. HAYRAPETIAN: Actually, can you give me			
05:15:58	3	55?			
05:15:58	4	Q Did you text Ms. Cooper at any point and say			
05:16:02	5	"Hey, when you get a chance, answer your phone. Walter			
05:16:06	6	is trying to give you a call from my office"?			
05:16:10	7	A I don't remember.			
05:16:14	8	MS. HAYRAPETIAN: Let's mark this as 108.			
05:16:30	9	(Exhibit 108 was marked for identification.)			
05:16:31	10	BY MS. HAYRAPETIAN:			
05:16:31	11	Q This was produced from Ms. Cooper's phone, and			
05:16:33	12	this is a text message on November 12, 2024. And it			
05:16:40	13	states, "From Ceasar McDowell, Hey, when you get a			
05:16:43	14	chance, answer your phone. Walter is trying to give you			
05:16:45	15	a call from my office. It will be a 562 number. I just			
05:16:49	16	tried to call you twice, but it didn't go. Walter			
05:16:55	17	should be sending you a text. He is on the legal team			
05:16:58	18	here. He just wants to update you."			
05:17:02	19	So do you now recall whether Walter was on			
05:17:08	20	Ms. Cooper's legal team?			
05:17:11	21	A I don't remember.			
05:17:11	22	Q But you see your text message?			
05:17:13	23	A Nope.			
05:17:14	24	Q You don't see your text message?			
05:17:16	25	A No.			

05:17:16	1	Q	Why not?
05:17:17	2	A	Because I don't see it.
05:17:19	3	Q	But the exhibit is right in front of you.
05:17:22	4	A	I see the exhibit.
05:17:23	5	Q	Okay. And did you read the language as I read
05:17:25	6	along with	n it?
05:17:26	7	A	No.
05:17:27	8	Q	Can you please read the language?
05:17:28	9	A	I read it now. I didn't read along with you.
05:17:32	10	Q	Okay. So do you see where you said
05:17:33	11	A	I see where somebody types something on a
05:17:35	12	paper. Yes, I see it.	
05:17:37	13	Q	And that's your phone number, we've
05:17:39	14	established earlier, or was your phone number?	
05:17:41	15	A	That used to be a number.
05:17:42	16	Q	Okay. And that's your name and Ms. Cooper's
05:17:44	17	phone, and this is a text message to Ms. Cooper.	
05:17:46	18	A	That's my name. Somebody typed my name on the
05:17:49	19	paper.	
05:17:50	20	Q	Yes.
05:17:50	21	А	Oh, yeah, they did.
05:17:51	22	Q	Okay. So you are accusing us of fabricating
05:17:54	23	this exhibit.	
05:17:55	24	Am I hearing that correctly?	
05:17:58	25		MR. HAYDEN: Objection. Argumentative.

05:17:59	1	THE WITNESS: I said my name was typed on a			
05:18:00	2	paper. Anything else you assumed.			
05:18:02	3	BY MS. HAYRAPETIAN:			
05:18:03	4	Q Okay. So you're refusing to look at the			
05:18:05	5	exhibit?			
05:18:06	6	A I just looked at it. I just told you I looked			
05:18:08	7	at it.			
05:18:08	8	Q Okay. And that's a text message from you;			
05:18:10	9	correct?			
05:18:11	10	A There's a words typed on the paper with my			
05:18:14	11	name. I don't know who that's a text message from.			
05:18:16	12	Q Okay. So are you refuting that you sent the			
05:18:20	13	text messages here next to your name; is that correct?			
05:18:24	14	A I'm telling you I don't remember.			
05:18:27	15	Q And reading this exhibit did not help you			
05:18:29	16	remember.			
05:18:29	17	Is that what you are saying?			
05:18:36	18	A I just told you, "I don't remember."			
05:18:37	19	Q Okay. You texted Ms. Cooper, telling her that			
05:18:39	20	Walter Roberts was on the legal team and he wanted to			
05:18:43	21	talk to her.			
05:18:44	22	What did Walter wanted to talk to Ms. Cooper			
05:18:47	23	about?			
05:18:49	24	MS. DIXON: Objection. Attorney-client			
05:18:50	25	privilege. And work product.			

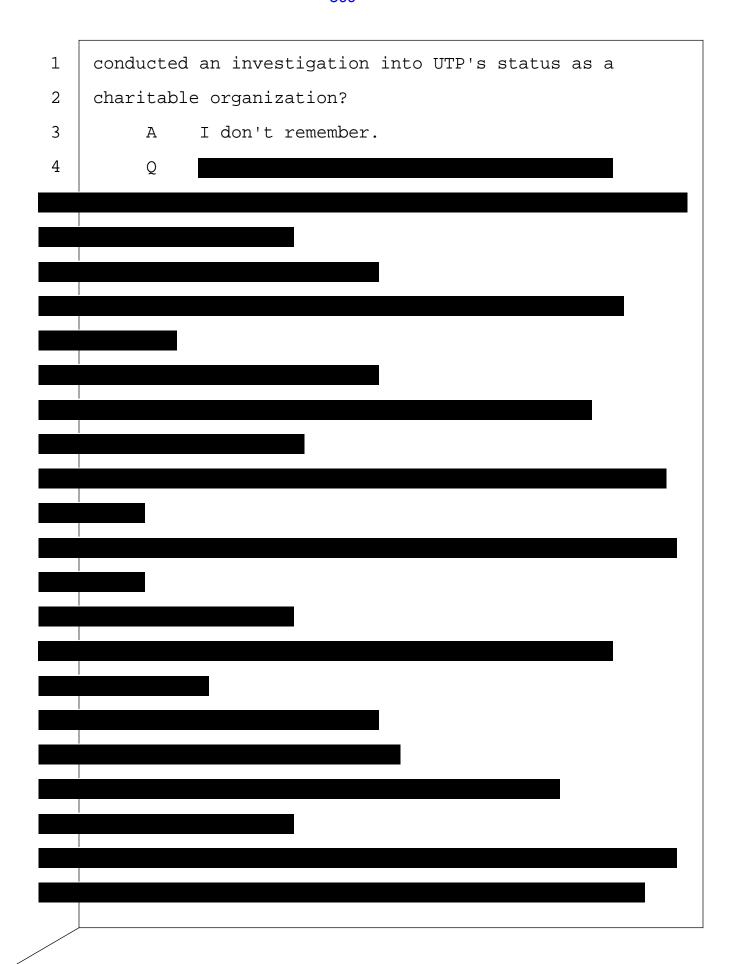
05:18:52	1	MS. HAYRAPETIAN: Are you his counsel?			
05:18:53	2	MS. DIXON: I can get to object. I can			
05:18:54	3	object, if I want to.			
05:18:55	4	MS. HAYRAPETIAN: No, you actually can't. He			
05:18:57	5	is not your witness.			
05:18:58	6	MS. DIXON: He was prior counsel for my			
05:18:59	7	client; so, therefore, there's a succession I'm a			
05:19:02	8	successor in interest.			
05:19:04	9	MR. HAYDEN: She beat me to it.			
05:19:04	10	I'll object to attorney-client privilege.			
05:19:07	11	BY MS. HAYRAPETIAN:			
05:19:07	12	Q Okay. Walter also prepared Sonstar for his			
05:19:10	13	deposition; correct?			
05:19:12	14	MR. HAYDEN: Objection. Speculation.			
05:19:12	15	Attorney-client privilege.			
05:19:16	16	THE WITNESS: I don't know. I don't remember.			
05:19:18	17	MS. HAYRAPETIAN: Actually, who prepared and			
05:19:21	18	when meetings happened is not privileged.			
05:19:25	19	MR. HAYDEN: It invades the work-product			
05:19:27	20	doctrine.			
05:19:28	21	BY MS. HAYRAPETIAN:			
05:19:29	22	Q Why is Mr. Roberts' profile nowhere to be			
05:19:32	23	found on the UTP website? Do you know?			
05:19:37	24	A Was that a question?			
05:19:38	25	Q Yes.			

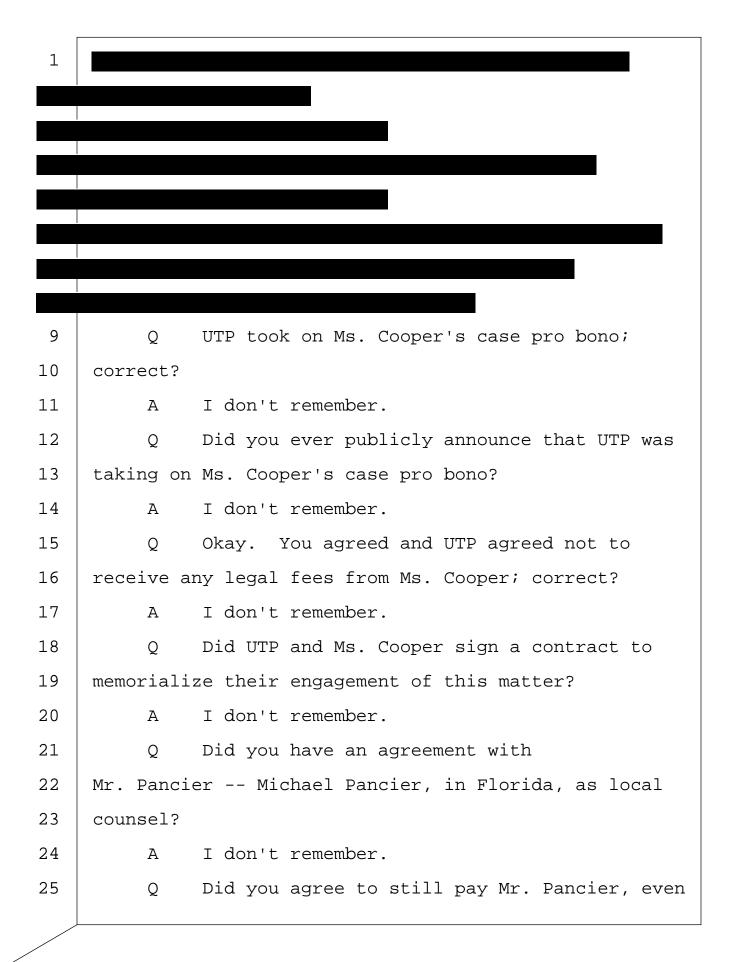
05:19:39	1	A What was the question?		
05:19:40	2	Q Why is Mr. Roberts' profile nowhere to be		
05:19:44	3	found on the UTP website?		
05:19:47	4	A Why is Araya's profile nowhere to be found on		
05:19:50	5	the website.		
05:19:51	6	Q Who is Araya?		
05:19:52	7	A Somebody else that works there too; right?		
05:19:54	8	Did anybody say that everybody that works		
05:20:00	9	there's profile is on the website?		
05:20:08	10	Q Was Mr. Roberts on the UTP website at any		
05:20:10	11	point?		
05:20:11	12	A Not that I remember.		
05:20:17	13	Q Do you know if Mr. Walter was ever a		
05:20:21	14	licensed attorney?		
05:20:22	15	A I don't remember.		
05:20:24	16	Q Did you know that Mr. Walter was disbarred?		
05:20:30	17	And we're looking at Exhibit 109 which is The State Bar		
05:20:33	18	of California's website attorney search?		
05:20:41	19	MR. HAYDEN: Objection. Relevance.		
05:20:46	20	THE WITNESS: I don't remember.		
05:20:46	21	(Exhibit 109 was marked for identification.)		
05:20:47	22	BY MS. HAYRAPETIAN:		
05:20:47	23	Q And this is the same Walter Roberts that spoke		
05:20:51	24	at your UTP press conference; correct?		
05:20:59	25	A I don't know who it is.		

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05:21:03	1	Q Do you know if Robert Walters is authorized to		
05:21:05	2	practice law?		
05:21:10	3	A I don't remember.	I don't remember.	
05:21:11	4	Q Has UTP ever been sued for	malpractice?	
05:21:16	5	A I don't remember.		
05:21:17	6	Q Has anyone ever threatened	to bring a lawsuit	
05:21:19	7	against UTP?		
05:21:20	8	A I don't remember.		
05:21:21	9	Q Has anyone ever filed a com	plaint against UTP	
05:21:26	10	with The State Bar of California?		
05:21:27	11	A I don't remember.		
05:21:28	12	Q Has anyone filed a non-atto	rney authorized	
05:21:32	13	practice of law complaint against you with The State Bar		
05:21:33	14	of California?		
05:21:36	15	A I don't remember.		
05:21:37	16	Q Has anyone filed an attorne	y misconduct	
05:21:39	17	complaint against any of UTP's lawyers with The State		
05:21:42	18	Bar of California?		
05:21:43	19	A I don't remember.		
05:21:44	20	Q What about any other state	bars?	
05:21:46	21	A I don't remember.		
05:21:47	22	Q Has the IRS every conducted	an investigation	
05:21:49	23	into UTP's tax-exempt status?		
05:21:53	24	A I don't remember.		
05:21:53	25	Q Has the California Attorney	General ever	





05:24:56	1	though you were taking on Ms. Cooper's case pro bono?
05:25:01	2	A I don't remember.
05:25:01	3	Q Did Ms. Cooper ever pay you to pay her Florida
05:25:10	4	lawyer?
05:25:10	5	A I don't remember.
05:25:12	6	Q Did local counsel, Mr. Pancier, withdraw
05:25:19	7	because he never received his attorney's fees?
05:25:22	8	MR. HAYDEN: Objection. Relevance.
05:25:23	9	Speculation.
05:25:25	10	THE WITNESS: I don't remember.
05:25:35	11	MS. HAYRAPETIAN: I'd like to mark as
05:25:36	12	Exhibit 110, Tab 25 please.
05:25:41	13	THE COURT REPORTER: 111. 111.
05:25:44	14	MS. HAYRAPETIAN: 111? No. I think I skipped
05:25:44	15	110.
05:26:11	16	(Exhibit 110 was marked for identification.)
05:26:11	17	BY MS. HAYRAPETIAN:
05:26:11	18	Q Have you ever seen this GiveSendGo page?
05:26:14	19	A What was your question?
05:26:15	20	Q Have you ever seen this GiveSendGo page?
05:26:19	21	A I don't remember.
05:26:22	22	Q Ms. Cooper raised some money through her
05:26:24	23	GiveSendGo for purposes of paying her legal fees.
05:26:26	24	Do you know how much Ms. Cooper raised on
05:26:28	25	GiveSendGo?

05:26:30	1	A I don't know.
05:26:32	2	Q Some contributors claimed that Ms. Cooper
05:26:36	3	embezzled the money by using it for non-legal expenses.
05:26:39	4	Were you aware of that?
05:26:41	5	A I don't remember.
05:26:41	6	Q Contributors noticed that since starting her
05:26:45	7	GiveSendGo page Ms. Cooper spent a lot of a lot on
05:26:49	8	Lululemon clothes, DoorDash orders of hibachi, personal
05:26:54	9	trips, and electronics for her family members.
05:26:56	10	Do you recall hearing that?
05:26:58	11	A No. I don't remember.
05:27:02	12	MS. HAYRAPETIAN: I'd like to mark for the
05:27:04	13	record Exhibit 111, and if we could please look at
05:27:11	14	Tabs 51, 51-A, and 51-B.
05:27:15	15	This isn't stapled, but it's going to be one
05:27:44	16	exhibit.
05:27:50	17	(Exhibit 111 was marked for identification.)
05:28:26	18	MS. DIXON: Is there one for me?
05:28:28	19	BY MS. HAYRAPETIAN:
05:28:28	20	Q Okay. So we're looking at a tweet from an
05:28:31	21	account called "Owe Truths." [As read] And it says,
05:28:33	22	hashtag Milagro Gramz Crowdfunding Campaign she made due
05:28:38	23	to being, quote, "indigent" to retain a lawyer for a
05:28:43	24	defamation civil suit she's in, as the defendant with
05:28:46	25	Megan Thee Stallion, has been in question to spectators.

05:28:49	1	Milagro put the amount raised in private from her donors
05:28:52	2	she claimed the United States the People lawyer needed
05:28:56	3	100K to even do her case. She told her followers she
05:28:59	4	sent allegedly 15K and additional 25K.
05:29:03	5	Some spectators noticed she was out spending
05:29:05	6	money for Lululemon, a lot of DoorDash orders of
05:29:09	7	hibachi, taking trips to Huntsville to purchase laptops
05:29:13	8	for her Granny that she claims has mild dementia,
05:29:16	9	allegedly. We received well, I received a DM from
05:29:21	10	someone that allegedly messaged Unite the People on
05:29:23	11	things she said about them negatively and how much money
05:29:28	12	she sent them, allegedly.
05:29:31	13	Do you recall receiving such a message on
05:29:35	14	social media?
05:29:37	15	MR. HAYDEN: Objection. Relevance.
05:29:41	16	THE WITNESS: Are you talking about the United
05:29:42	17	States the People lawyer? Who is that?
05:29:44	18	BY MS. HAYRAPETIAN:
05:29:45	19	Q I think they made a mistake, but
05:29:46	20	A Oh, they made a mistake? Oh.
05:29:49	21	Q Do you recall receiving such a message?
05:29:51	22	A I don't remember.
05:29:52	23	Q Okay. So let's look at let's look at the
05:30:00	24	next two pages which are the attachments to the tweet,
05:30:02	25	and I'm talking about the loose-leaf pages.

05:31:34

25

JOB NO. 1837675

05:30:05	1	So I'm first looking at the message that says
05:30:10	2	9:07 PM, and it looks like it's coming from UTP.
05:30:14	3	[As read] And it says, I can't believe that is true
05:30:18	4	because she did not give us the full 18. She sent us a
05:30:24	5	portion of it, and that entire portion went to that
05:30:26	6	attorney; and, of course, I have all the receipts of any
05:30:29	7	transfers.
05:30:29	8	But, besides that, what she paid, I have
05:30:33	9	personally paid 50, 60,000 to that attorney; so I would
05:30:38	10	really hope that she wouldn't be bashing us. But, sure,
05:30:41	11	you could send the audio if that is true. I would
05:30:44	12	definitely want to hear it. I haven't had time to stop
05:30:47	13	and assess the situation but sure.
05:30:51	14	Is that a message you sent?
05:30:53	15	A I don't remember.
05:30:54	16	Q And then, looking at the next page, it says,
05:31:03	17	in a direct message from Unite the People, [As read] and
05:31:10	18	I would really hope she wouldn't be bashing us because
05:31:13	19	we have not only assigned our attorneys for free for
05:31:16	20	pro bono for her, I personally picked up, like I said,
05:31:20	21	at least 50-, 60,000 of my own organization's money was
05:31:24	22	paid to that other Florida lawyer, plus she sent us a
05:31:28	23	portion of 18. We sent the entire portion to the
05:31:31	24	Florida lawyer, and she sent him directly the other
05.21.24	0.5	

portion; so we went above and beyond to help Millie.

05:31:36	1	And I know they said there was some things
05:31:39	2	going on with him getting off the case. Myself and my
05:31:42	3	legal team we're just going through ways to find
05:31:45	4	to hire her another lawyer in Florida, and we were going
05:31:48	5	to pay for it; so, if what you are saying is true, that
05:31:52	6	would be really sad.
05:31:52	7	So, yes, if there's some audio of that, please
05:31:56	8	send that to me; but I have to say I doubt that that's
05:31:58	9	true, just because after all the personal struggle I
05:32:01	10	went through to make sure this guy in Florida was
05:32:03	11	getting paid. I'm the only one that paid personal money
05:32:06	12	to help her. She raised money on a platform; I paid.
05:32:09	13	Was that a message you sent?
05:32:12	14	A I don't remember.
05:32:13	15	Q Do you have any reason to believe that
05:32:27	16	Ms. Cooper used any of the money she raised on the
05:32:30	17	the fund for legal defense for other purposes?
05:32:35	18	A No.
05:32:35	19	Q How do you know that?
05:32:38	20	A You said, "Do I have any reason to believe."
05:32:40	21	You didn't say, "Did I know that." I don't have a
05:32:42	22	reason to believe that.
05:32:43	23	Q Has Ms. Cooper admitted to you that she raised
05:32:51	24	money for her legal defense and then did not use it for
05:32:55	25	her legal defense?

05:32:56	1	A No.
05:32:58	2	Q Did Ms. Cooper send UTP the full amount she
05:33:00	3	raised on GiveSendGo to cover legal fees and expenses?
05:33:06	4	MS. DIXON: Objection. Calls for speculation.
05:33:10	5	THE WITNESS: I don't remember.
05:33:11	6	BY MS. HAYRAPETIAN:
05:33:11	7	Q Have you how much money has UTP received
05:33:15	8	from Ms. Cooper?
05:33:21	9	A I don't remember.
05:33:21	10	Q Okay.
05:33:24	11	MS. HAYRAPETIAN: Marking as Exhibit 112,
05:33:33	12	Tab 26.
05:33:37	13	Actually, I'm going to skip that.
05:33:47	14	BY MS. HAYRAPETIAN:
05:33:47	15	Q Going back to the screenshots that we just
05:33:49	16	looked at. Is it true that UTP sent at least 50,000 or
05:33:52	17	60,000 of its own funds to pay for Ms. Cooper's local
05:33:55	18	counsel?
05:33:58	19	A I don't remember.
05:33:59	20	Q Why did UTP spend this amount to support
05:34:05	21	Ms. Cooper's case?
05:34:07	22	A I just said, "I don't remember."
05:34:10	23	MR. HAYDEN: Objection. Speculation.
05:34:11	24	Relevance.
05:34:12	25	BY MS. HAYRAPETIAN:

05:34:12	1	Q Did Tory instruct UTP to spend this money to
05:34:15	2	support Ms. Cooper's case?
05:34:16	3	MR. HAYDEN: Same objections.
05:34:18	4	THE WITNESS: I don't remember.
05:34:19	5	BY MS. HAYRAPETIAN:
05:34:19	6	Q Are you aware Ms. Cooper has publicly accused
05:34:23	7	of you of asking her to promote UTP to her followers and
05:34:27	8	asked them to post good reviews for UTP to drown out the
05:34:30	9	bad ones?
05:34:31	10	MR. HAYDEN: Objection. Speculation.
05:34:33	11	THE WITNESS: I don't remember.
05:34:33	12	BY MS. HAYRAPETIAN:
05:34:34	13	Q Earlier this week, Ms. Cooper testified during
05:34:39	14	her deposition about a legal dispute she had with you
05:34:42	15	and UTP. And here is some language from the rough
05:34:47	16	deposition transcript from Monday.
05:34:49	17	The question was, "And then you said something
05:34:52	18	about paying him back eventually. What was that? Was
05:34:55	19	that talked about in the beginning?"
05:34:56	20	"No."
05:34:57	21	"When did that come up?"
05:34:59	22	"Answer: When Ceasar stole my money.
05:35:02	23	"Question: Tell me about that.
05:35:04	24	"Answer: The contract was for pro bono.
05:35:07	25	Representation. Ceasar came to me, and said, 'I need

05:35:10	1	money for your lawyer, and if you don't figure out
05:35:14	2	figure something out, you are not going to have a lawyer
05:35:16	3	because I can't do it.'"
05:35:18	4	MR. HAYDEN: Objection. Speculation.
05:35:21	5	BY MS. HAYRAPETIAN:
05:35:21	6	Q Do you recall having such a conversation?
05:35:24	7	A I don't recall.
05:35:24	8	Q Are you saying Ms. Cooper lied under oath when
05:35:37	9	she claimed to have this conversation with you?
05:35:43	10	A I don't recall.
05:35:43	11	Q Did you steal Ms. Cooper's legal funds?
05:35:51	12	MR. HAYDEN: Objection. Speculation.
05:35:52	13	Argumentative. Lacks foundation.
05:35:56	14	THE WITNESS: No.
05:35:57	15	BY MS. HAYRAPETIAN:
05:35:57	16	Q Did anyone at UTP steal Ms. Cooper's legal
05:36:02	17	funds?
05:36:03	18	MR. HAYDEN: Same objections.
05:36:04	19	THE WITNESS: No.
05:36:05	20	BY MS. HAYRAPETIAN:
05:36:05	21	Q So why is Ms. Cooper then accusing you of
05:36:08	22	stealing her from her?
05:36:10	23	MS. DIXON: Objection. Calls for speculation.
05:36:14	24	THE WITNESS: I don't know. I can't speculate
05:36:15	25	to that.

05:36:17	1	MS. HAYRAPETIAN: So, Counsel, you just
05:36:18	2	coached a witness that is not yours.
05:36:21	3	MS. DIXON: He made that statement.
05:36:22	4	MS. HAYRAPETIAN: On on speculative which,
05:36:23	5	again, is not an appropriate objection, and particularly
05:36:25	6	not in Southern District of Florida.
05:36:28	7	MS. DIXON: Actually, everything you are
05:36:30	8	saying is a speaking objection; so
05:36:32	9	MS. HAYRAPETIAN: And then, you are also
05:36:33	10	misrepresenting the record where your client testified,
05:36:37	11	under oath, quote, "When Ceasar stole my money."
05:36:41	12	MS. DIXON: I'm not mis I didn't state
05:36:41	13	anything about the record; so you are misrepresenting
05:36:44	14	what I said. I didn't say anything about the record.
05:36:48	15	BY MS. HAYRAPETIAN:
05:36:49	16	Q So then were why would Ms. Cooper accuse you
05:36:51	17	of stealing her money?
05:36:55	18	A I don't know.
05:36:58	19	Q UTP and Ms. Cooper had entered into a contract
05:37:00	20	in which UTP agreed to represent her on a pro bono
05:37:03	21	basis; correct?
05:37:05	22	A I don't remember.
05:37:11	23	Q Okay. UTP eventually withdrew from
05:37:13	24	representing Ms. Cooper; correct?
05:37:14	25	A I don't know.

05:37:15	1	Q Okay.
05:37:23	2	MS. HAYRAPETIAN: Let's mark Exhibit 112,
05:37:27	3	Tab 27, please.
05:37:29	4	(Exhibit 112 was marked for identification.)
05:37:50	5	BY MS. HAYRAPETIAN:
05:37:50	6	Q This is a tweet May 25, 2025, from Ms. Cooper.
05:37:54	7	It states, "Also, unfortunately, Unite the People, who
05:37:57	8	publicly asserted that they would take on my case of no
05:38:00	9	cost to me, doesn't have the resources to challenge the
05:38:03 1	.0	machine. They withdrew, as the Florida lawyer did, for
05:38:06 1	.1	this same reason."
05:38:11 1	.2	Do you recall withdrawing do you recall
05:38:15 1	.3	when UTP withdrew from Ms. Cooper's representation now?
05:38:20 1	.4	A I don't remember.
05:38:21 1	.5	Q Financial hardship was not the reason UTP
05:38:26 1	.6	withdrew; correct?
05:38:29 1	.7	MR. HAYDEN: Objection. Speculation.
05:38:31 1	.8	THE WITNESS: I don't remember.
05:38:43 1	.9	MS. HAYRAPETIAN: I'd like to mark
05:38:44 2	20	Exhibit 113, and if we could please pull up Tab 28-A.
05:38:54 2	21	And then the corresponding transcript will be 113-B.
05:40:24 2	22	(Exhibit 113-A was marked for identification.)
05:40:24 2	23	(Exhibit 113-B was marked for identification.)
05:40:24 2	24	(A video clip was played.)
05:40:25 2	25	BY MS. HAYRAPETIAN:

05:40:26	1	Q Okay. So, in May 2025, as her lawyers are
05:40:57	2	withdrawing from this case and representing her,
05:41:01	3	Ms. Cooper goes on live stream, and she is saying she's
05:41:07	4	never going to help Tory again.
05:41:10	5	What was she helping
05:41:13	6	MS. DIXON: Objection. It misstates what the
05:41:14	7	evidence is showing.
05:41:15	8	MS. HAYRAPETIAN: Okay. Well, we just
05:41:16	9	listened to the transcript.
05:41:17	10	MS. DIXON: It didn't say that.
05:41:18	11	MS. HAYRAPETIAN: And the language is there.
05:41:19	12	MS. DIXON: Okay. Well, just go on the
05:41:21	13	language that's there then.
05:41:22	14	BY MS. HAYRAPETIAN:
05:41:23	15	Q So what was Ms. Cooper helping Tory with?
05:41:29	16	MR. HAYDEN: Objection. Speculation. Assumes
05:41:31	17	facts not in evidence.
05:41:36	18	THE WITNESS: The audio and the paper you just
05:41:38	19	handed me don't say one word about Tory. I don't see
05:41:42	20	Tory nowhere in there. So I don't know what you are
05:41:44	21	talking about. I think you must be asking me about
05:41:48	22	something you didn't hand me.
05:41:49	23	Can you hand me the paper that says "Tory"
05:41:51	24	please?
05:41:51	25	BY MS. HAYRAPETIAN:
		!

05:41:52	1	Q So it's in the first box. And if you look at
05:41:54	2	the first box, the third line from the bottom in the
05:41:56	3	first box.
05:41:58	4	A That says put God I'm talking about where
05:42:00	5	she said you said she said she would never ride for
05:42:05	6	Tory or whatever again. She didn't say anything about
05:42:07	7	Tory not one word about Tory. Down at the bottom,
05:42:10	8	she says she feels like God put Tory in her life or
05:42:14	9	whatever; so I don't know what you're talking about.
05:42:14	10	If you want to hand me the one that says that
05:42:16	11	she ain't never going to fucking ride for Tory or I
05:42:19	12	don't know if you're are you using his name in
05:42:21	13	replacing the word "nigga"? Are you insinuating that
05:42:24	14	Tory is a nigga? That's what it sounds like to me.
05:42:30	15	Q Okay. Are you going to answer my question?
05:42:35	16	A I just did.
05:42:37	17	Q That's your answer to my question?
05:42:39	18	A You want to ask your question again?
05:42:41	19	Q You've wasted enough of everyone's time today.
05:42:45	20	A I think you have.
05:42:49	21	Q UTP has a board of directors; correct?
05:42:56	22	A I don't recall.
05:42:57	23	Q As the CEO of UTP, you don't know whether UTP
05:43:01	24	has a board of directors?
05:43:03	25	A I don't recall.

05:43:04	1	Q	What role does the board play in UTP's
05:43:06	2	operation	s and management?
05:43:08	3	A	I don't recall.
05:43:09	4	Q	Who are the current board members?
05:43:11	5	A	I don't recall.
05:43:12	6	Q	Is your brother Mitch McDowell a board member?
05:43:15	7	A	I don't recall.
05:43:16	8	Q	Is Tni Jackson a board member?
05:43:21	9	A	I don't recall.
05:43:21	10	Q	How are board members selected?
05:43:23	11	A	I don't recall.
05:43:25	12	Q	Are UTP board members financially compensated
05:43:28	13	for holdi	ng these positions?
05:43:30	14	A	I don't recall.
05:43:30	15	Q	Why are you not a board member?
05:43:32	16	A	I don't recall.
05:43:33	17	Q	Is your tenure as CEO subject to boards'
05:43:36	18	approval?	
05:43:37	19	A	I don't recall.
05:43:38	20	Q	UTP has advisory members; correct?
05:43:41	21	A	I don't recall.
05:43:41	22	Q	You are one of these advisory members?
05:43:45	23	A	I don't recall.
05:43:49	24	Q	What role do you what role does advisory
05:43:51	25	members p	play?
		1	

05:43:52	1	A I don't recall.
05:43:58	2	MS. HAYRAPETIAN: Okay. Let's mark for the
05:44:00	3	record Tab 14 which is sorry Exhibit 114 which is
05:44:02	4	Tab 49.
05:44:03	5	(Exhibit 114 was marked for identification.)
05:44:26	6	BY MS. HAYRAPETIAN:
05:44:26	7	Q Okay. This is a printout from UTP's website.
05:44:28	8	Title says, "Advisory Members." Number 1,
05:44:31	9	Ceasar McDowell; number 2, Mitch McDowell; number 3,
05:44:34	10	Danielle Frost; number 4, Mari Ronquillo; 5, Tory Lanez,
05:44:45	11	6; Todd Perry II; 7, Tni Jackson.
05:44:49	12	Do you see that?
05:45:00	13	A I see that on the paper.
05:45:02	14	Q Okay. So do you recall whether you are an
05:45:09	15	advisory member of Unite the People?
05:45:13	16	A I don't recall.
05:45:14	17	Q Okay. Mari Ronquillo is also an advisory
05:45:21	18	member; right?
05:45:22	19	A I don't recall.
05:45:23	20	Q Okay. Well, we just looked at this exhibit,
05:45:24	21	and on page 3 of this exhibit, it states that
05:45:30	22	Mari Ronquillo is a advisory member at your organization
05:45:36	23	Unite the People, which you are both a co-founder and
05:45:39	24	CEO; correct?
05:45:41	25	A That's what you said.

05:45:42	1	Q Okay. So how did Ms. Ronquillo become an
05:45:46	2	advisory member?
05:45:47	3	A I don't recall.
05:45:48	4	Q Since when is Ms. Ronquillo been an advisory
05:45:50	5	member?
05:45:51	6	A I don't recall.
05:45:52	7	Q What role does Ms. Ronquillo play as an
05:45:54	8	advisory member?
05:45:56	9	A I don't know.
05:45:56	10	Q Is Ms. Ronquillo compensated as an advisory
05:46:00	11	member?
05:46:01	12	A I don't know.
05:46:01	13	Q Ms. Ronquillo is the founder of Lyme Lite
05:46:03	14	Media and Public Relations; correct?
05:46:05	15	A I don't know. You'd have to ask her.
05:46:07	16	Q So let's go to page 4. And this is the bio of
05:46:20	17	Ms. Ronquillo on your website, the company where you are
05:46:25	18	a CEO and advisory member and a co-founder. And it says
05:46:29	19	from there, Lyme Lite Media became the public
05:46:33	20	publicity team for countless top-trending superstars,
05:46:36	21	and it's talking about Ms. Ronquillo's involvement in
05:46:41	22	the organization. And it says, on page 3, "It is no
05:46:47	23	mystery why that Lyme Lite Media, run by Mari Ronquillo,
05:46:52	24	is one of the first word-of-mouth, sought-after boutique
05:46:56	25	public relations firms recommended."

05:46:58	1	Do you see that? On your website?
05:47:09	2	A I see it on this paper.
05:47:11	3	Q Lyme Lite helps artists and entertainers with
05:47:16	4	their public relations; correct?
05:47:17	5	A I don't know.
05:47:18	6	Q Ms. Ronquillo advises UTP on its press
05:47:21	7	releases and conferences; correct?
05:47:23	8	A I don't know.
05:47:24	9	Q Does Ms. Ronquillo assist you with drafting
05:47:27	10	social media posts on UTP's account?
05:47:29	11	A I don't know.
05:47:30	12	Q Are you aware the Lyme Lite previously reached
05:47:32	13	out to Ms. Cooper before the start of this litigation?
05:47:36	14	A I don't know.
05:47:40	15	MS. HAYRAPETIAN: I'd like to introduce and
05:47:43	16	mark for the record Exhibit 115.
05:48:06	17	(Exhibit 115 was marked for identification.)
05:48:06	18	BY MS. HAYRAPETIAN:
05:48:06	19	Q And this is a text compilation produced by
05:48:09	20	Ms. Cooper, Bates number DEFMG000219. And we're looking
05:48:13	21	at the very first text on the left-hand side, the very
05:48:16	22	first screenshot on the left-hand side top-corner.
05:48:22	23	Milagro texting Sonstar. And she states,
05:48:24	24	"Hey, I was contacted by Mari, and I just wanted to
05:48:28	25	confirm that it was her before saying or sending

05:48:31	1	anything. Her last four are 0824, and the email address
05:48:35	2	provided is mari@lymelitemedia.com. Thank you so much."
05:48:39	3	And December 7, 2022, was just a few days
05:48:48	4	before Tory's criminal trial commenced for the shooting,
05:48:54	5	which is when this text message is dated.
05:48:56	6	Do you see that?
05:49:00	7	A I see it.
05:49:01	8	Q Okay. So Sonstar appears to have shared
05:49:03	9	Ms. Cooper's contact details with your advisory board
05:49:06	10	member Ms. Ronquillo; right?
05:49:08	11	A I don't see that.
05:49:10	12	Q Okay. Well, your client, Ms. Cooper, is
05:49:13	13	telling Tory's father that she was contacted by Mari,
05:49:18	14	and he she is checking with Sonstar to make sure that
05:49:23	15	that's the correct person. And that person happens to
05:49:26	16	be an advisory board member at your company; correct?
05:49:29	17	A I don't know.
05:49:32	18	Q Okay. Do you know how Sonstar knows
05:49:35	19	Ms. Ronquillo?
05:49:36	20	A I don't know.
05:49:37	21	Q Are you the one who introduced Sonstar to
05:49:38	22	Ms. Ronquillo, your advisory board member?
05:49:42	23	A No.
05:49:45	24	Q Did Ms. Ronquillo to reach out to Ms. Cooper
05:49:48	25	per your directive?

05:49:51	1	А	No.
05:49:52	2	Q	Was it per Tory's directive?
05:49:55	3		MR. HAYDEN: Objection. Speculation.
05:49:56	4		THE WITNESS: I wouldn't know.
05:49:58	5	BY MS. HA	YRAPETIAN:
05:49:58	6	Q	Does Sonstar have a role at UTP?
05:50:06	7	А	I don't know.
05:50:07	8	Q	Has Sonstar ever donated financially to UTP?
05:50:13	9	А	I don't know.
05:50:13	10	Q	Has Sonstar ever participated in UTP meetings?
05:50:20	11	А	I don't know.
05:50:26	12	Q	Do you have a salary as CEO of UTP?
05:50:28	13	А	I don't know.
05:50:28	14	Q	You don't know if you get paid from UTP?
05:50:31	15	А	You didn't ask me, do I get paid. You asked,
05:50:33	16	do I have	a salary.
05:50:35	17	Q	Do you get paid by UTP?
05:50:36	18	А	Yes.
05:50:38	19	Q	How what what's the arrangement?
05:50:40	20	А	I don't know.
05:50:41	21	Q	You don't know how much money you make from
05:50:42	22	UTP?	
05:50:43	23	А	Nope.
05:50:44	24	Q	Is it on a monthly basis?
05:50:47	25	А	I don't know.

05:50:48	1	Q	Bi-weekly basis?
05:50:50	2	А	I don't know.
05:50:51	3	Q	Are you paid annually?
05:50:53	4	А	I don't know.
05:50:54	5	Q	Are you paid quarterly?
05:50:55	6	А	I don't know.
05:50:56	7	Q	Do you get bonuses?
05:50:57	8	А	I don't know.
05:50:58	9		MR. HAYDEN: Objection. Relevance.
05:51:00	10	BY MS. HA	YRAPETIAN:
05:51:00	11	Q	How do you make income to make a living?
05:51:08	12	А	I work hard, massa.
05:51:11	13	(The	Court Reporter requested clarification.)
05:51:11	14		THE WITNESS: I work hard, massa. M-A-S-S-A.
05:51:16	15	Massa.	
05:51:16	16	BY MS. HA	YRAPETIAN:
05:51:16	17	Q	What's that? What's master?
05:51:20	18	А	I said, "massa."
05:51:22	19	Q	Okay. What's massa?
05:51:24	20	А	I don't know.
05:51:30	21	Q	So how do you make money to live?
05:51:33	22	А	I work hard.
05:51:35	23	Q	Okay. Where do you derive your income from?
05:51:39	24	А	I don't know.
05:51:40	25	Q	Have you ever been paid in cash by anyone from

05:51:45	1	UTP?	
05:51:48	2	А	I don't know.
05:51:49	3	Q	Do you have any income sources besides UTP?
05:51:52	4	А	I don't know.
05:51:54	5	Q	Do you have bank accounts separate from UTP?
05:51:57	6	А	I don't know.
05:51:58	7	Q	After your press conference, Drake promoted
05:52:01	8	Tory's pe	tition; correct?
05:52:02	9	А	Who.
05:52:03	10	Q	Drake?
05:52:03	11	А	Who is that?
05:52:04	12	Q	Aubrey Graham?
05:52:06	13	А	I don't know who that is.
05:52:07	14	Q	You don't know who Drake is?
05:52:08	15	А	Drake?
05:52:09	16	Q	Yes. The music artist.
05:52:11	17	А	Oh. The rapper guy?
05:52:15	18	Q	Correct.
05:52:15	19	А	Uh-huh. He is good.
05:52:17	20	Q	So, after your press conference about Tory and
05:52:23	21	the stabb	ing, Gianno Caldwell put a petition for people
05:52:27	22	to sign t	o petition the governor to pardon Tory;
05:52:29	23	correct?	
05:52:33	24	А	I don't know. You have to ask Gianno.
05:52:34	25	Q	Okay. Did you ever promote or sign a petition

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05:52:36	1	on behalf of Tory Lanez for the governor to pardon him?
05:52:41	2	A I don't recall.
05:52:42	3	Q How did Drake become aware of that petition?
05:52:48	4	MS. DIXON: Objection. Calls for speculation.
05:52:50	5	And relevance.
05:52:53	6	BY MS. HAYRAPETIAN:
05:52:54	7	Q Sir?
05:52:55	8	A Huh?
05:52:55	9	Q Can you answer my question.
05:52:57	10	A How did who?
05:52:58	11	Q How did Drake become aware of that petition?
05:53:03	12	A How could I possibly know?
05:53:05	13	Q Did anyone from UTP communicate with Drake's
05:53:08	14	team?
05:53:08	15	MR. HAYDEN: Objection. Speculation.
05:53:11	16	THE WITNESS: And relevance.
05:53:11	17	I don't know. Who did what?
05:53:16	18	BY MS. HAYRAPETIAN:
05:53:16	19	Q Did anyone from your organization, UTP,
05:53:19	20	communicate with Drake's team about this petition?
05:53:22	21	A I love Drake. Man, I wish I could talk to
05:53:26	22	Drake. I don't know Drake.
05:53:28	23	Q Okay. Do you know anyone in Drake's team?
05:53:36	24	A No.
05:53:36	25	Q After Drake posted about the petition, did

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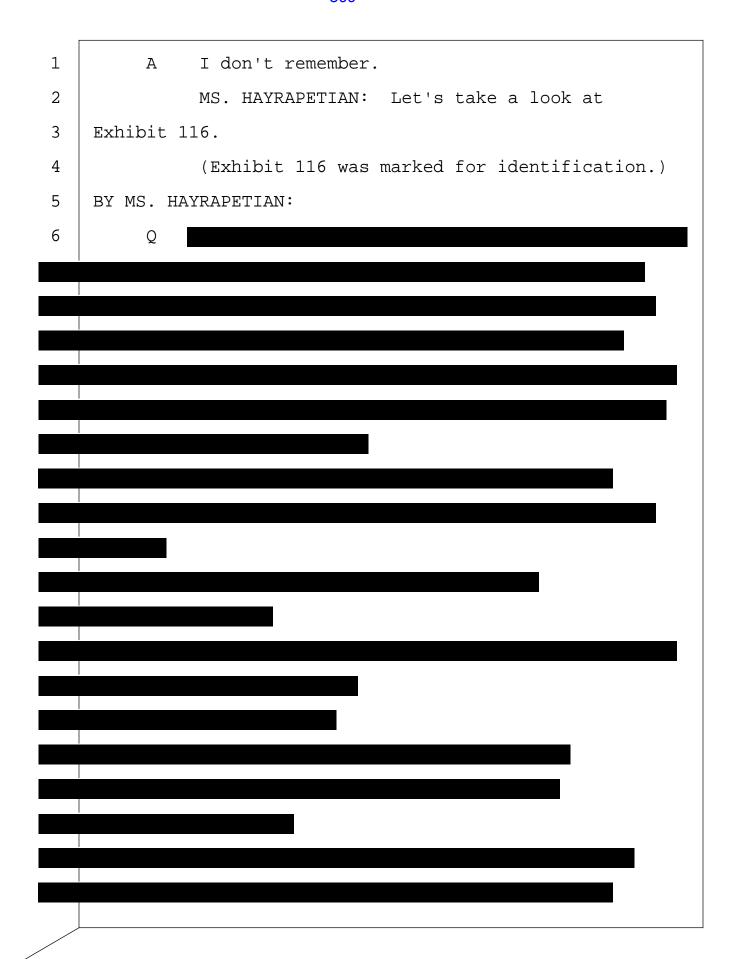
05:53:39	1	other cel	ebrities follow?
05:53:43	2	А	I don't know.
05:53:44	3	Q	Do you coordinate messaging with celebrity
05:53:47	4	represent	atives?
05:53:48	5	А	Who?
05:53:49	6	Q	Celebrity representatives?
05:53:50	7	А	Representatives of who?
05:53:53	8	Q	Celebrities.
05:53:54	9	А	Celebrities that represent celebrities. I
05:53:56	10	don't kno	w that.
05:53:57	11	Q	Okay. Do you know Adin Ross?
05:54:00	12	А	Who?
05:54:00	13	Q	Adin Ross?
05:54:02	14	А	He is a rapper?
05:54:05	15	Q	Do you know someone named Adin Ross?
05:54:10	16	А	I don't even know who that is.
05:54:12	17	Q	You wanted to connect with DJ Akademiks
05:54:20	18	through M	s. Cooper; correct?
05:54:22	19		MR. HAYDEN: Objection. Speculation.
05:54:23	20		THE WITNESS: I don't remember.
05:54:23	21	BY MS. HA	YRAPETIAN:
05:54:24	22	Q	Did you ever speak with DJ Akademiks directly?
05:54:28	23	А	I don't remember.
05:54:29	24	Q	Has DJ Akademiks paid you for coordination of
05:54:32	25	content?	

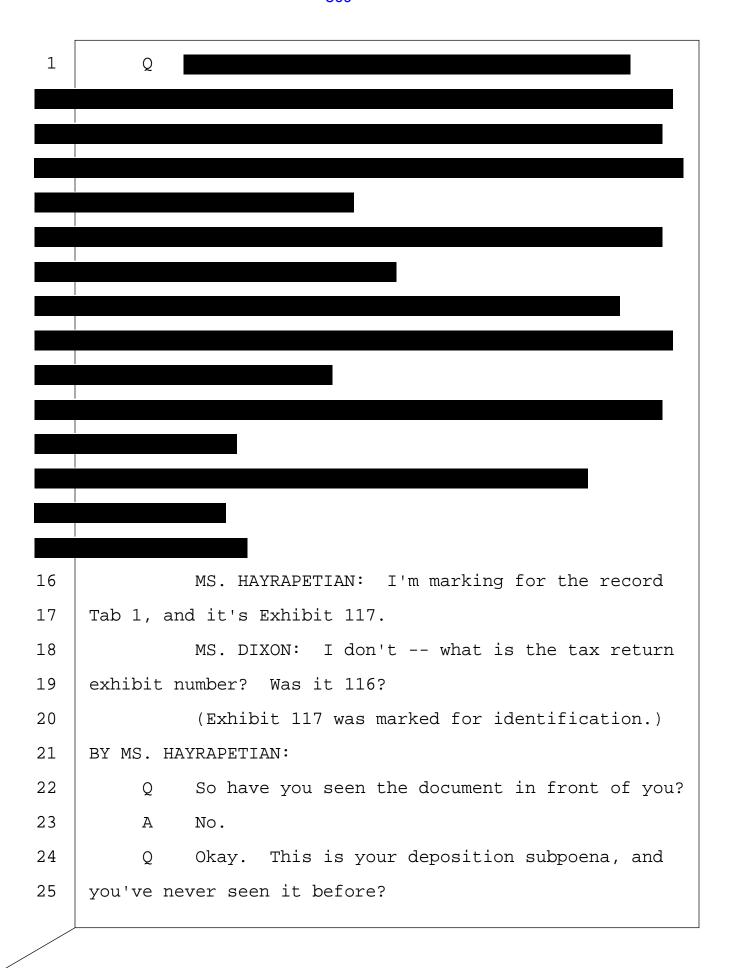
05.54.22	1	MD HAMDENI: Objection Crossilation
05:54:33	1	MR. HAYDEN: Objection. Speculation.
05:54:35	2	THE WITNESS: Nobody paid me for nothing.
05:54:37	3	BY MS. HAYRAPETIAN:
05:54:37	4	Q Do you know who Kelsey Harris is?
05:54:39	5	MR. HAYDEN: Objection. Relevance.
05:54:42	6	THE WITNESS: I don't know her.
05:54:42	7	BY MS. HAYRAPETIAN:
05:54:44	8	Q You were at Tory's trial; right?
05:54:47	9	A Some days.
05:54:48	10	Q Okay. And you also worked on Tory's case with
05:54:53	11	regards to the shooting; right?
05:54:55	12	A No.
05:54:57	13	Q UTP handled parts of Tory's case; correct?
05:55:02	14	A No.
05:55:03	15	Q Okay. So how is Tory UTP's client?
05:55:07	16	A Well, you you have to, again, understand
05:55:10	17	post-conviction. If you don't understand, you just keep
05:55:12	18	running around in a circle.
05:55:13	19	Unite the People did not have anything to do
05:55:15	20	with Tory's criminal case.
05:55:17	21	Q Okay. What did you have to do with then?
05:55:19	22	A Post-conviction.
05:55:20	23	Q Okay. And
05:55:21	24	A That's after the case.
05:55:22	25	Q how does the process work?

05:55:24	1	A So we didn't represent him during the case;
05:55:26	2	that's after the case.
05:55:27	3	Q Okay. So after the case, you represented him;
05:55:29	4	correct?
05:55:29	5	A Yes.
05:55:30	6	Q And what did your representation entail at
05:55:32	7	that point? I don't do post-conviction. I don't do
05:55:37	8	that work
05:55:38	9	A Then I don't know.
05:55:38	10	Q so I'm asking you.
05:55:40	11	A I don't know either. You'll have to ask your
05:55:40	12	lawyers.
05:55:42	13	MR. HAYDEN: Objection. Calls for a
05:55:43	14	narrative.
05:55:45	15	BY MS. HAYRAPETIAN:
05:55:46	16	Q So you have some familiarity with the facts of
05:55:48	17	his case?
05:55:50	18	A Not too much.
05:55:52	19	Q And you know that Kelsey Harris was in the car
05:55:54	20	with Tory and Megan at the time of the shooting?
05:55:57	21	A Who is Kelsey Harris?
05:55:59	22	Q I'm asking, are you aware that Kelsey Harris
05:56:03	23	was in the car?
05:56:05	24	A I'm asking you, who is Kelsey Harris?
05:56:07	25	Q Okay. So Kelsey Harris, as you would know,

05:56:11	1	since you are working on Tory's post-conviction matter,
05:56:16	2	was one of the people at the scene of the crime. And
05:56:22	3	she was allegedly sleeping with Tory at the time;
05:56:24	4	correct?
05:56:26	5	A I don't know. You'd have to ask them.
05:56:28	6	MR. HAYDEN: Objection. Speculation.
05:56:28	7	Relevance.
05:56:29	8	BY MS. HAYRAPETIAN:
05:56:30	9	Q Okay. Kelsey originally identified Tory as
05:56:33	10	the shooter in police interviews; correct?
05:56:35	11	A I don't know. You got to ask Kelsey.
05:56:37	12	Q But at trial
05:56:38	13	MS. DIXON: Objection. That misstates the
05:56:39	14	evidence, actually.
05:56:40	15	BY MS. HAYRAPETIAN:
05:56:41	16	Q she flipped and pleaded the Fifth; correct?
05:56:45	17	A I don't know. You got to ask her.
05:56:51	18	Q Do you know what 1501 Entertainment is?
05:56:55	19	A The strip club?
05:56:58	20	Q The record label.
05:56:59	21	A No. I have never heard of it.
05:57:01	22	Q Do you know Jay Prince?
05:57:15	23	A Jay Prince, the guy from Chicago? Is that who
05:57:19	24	we're talking about?
05:57:20	25	Q Have you ever been paid by Jay Prince or

	1	
05:57:22	1	anyone connected to him?
05:57:24	2	A Wow. No.
05:57:27	3	Q After Drake promoted Tory's petition, did
05:57:30	4	Jay Prince contact Jay Prince's people contact you?
05:57:34	5	A No.
05:57:36	6	Q Have you received instructions from
05:57:37	7	Jay Prince's organization?
05:57:42	8	A No.
05:57:43	9	Q Have you received funding from music industry
05:57:52	10	sources?
05:57:54	11	A No.
05:57:55	12	Q Are there payments to you personally that
05:58:00	13	don't go through UTP?
05:58:02	14	A No.
05:58:02	15	Q Have you received payments you were told to
05:58:05	16	keep confidential?
05:58:08	17	A No.
05:58:11	18	Q Okay. Your website states that "UTP is a 501c
05:58:18	19	non-profit organization"; right?
05:58:19	20	A No.
05:58:20	21	Q It is not?
05:58:20	22	A 501(c)3.
05:58:23	23	Q Okay. 501(c)3.
05:58:26	24	A Yes, ma'am.
05:58:26	25	Q Okay. When did UTP obtain 501(c)3 status?





06:02:16	1	A Not at all.
06:02:21	2	Q Did you meet with your lawyer before you came
06:02:22	3	to this deposition?
06:02:23	4	A No.
06:02:24	5	Q Your lawyer did not show you this deposition
06:02:27	6	notice?
06:02:29	7	A I don't recall.
06:02:29	8	Q How did you know to come to your deposition
06:02:32	9	today?
06:02:37	10	A I was told there was a deposition today.
06:02:38	11	Q Okay. Were you provided a copy of that
06:02:43	12	document at any point?
06:02:44	13	A I don't recall.
06:02:46	14	Q Did you receive a list of documents you were
06:02:48	15	supposed to search for to bring to your deposition?
06:02:52	16	A I don't recall.
06:02:54	17	Q Okay. Let's go to page it's towards the
06:03:04	18	end. It's going to be page 7.
06:03:11	19	So the first request requires you to produce
06:03:14	20	all documents and communications between you and
06:03:17	21	defendant that refer or relate to Ms. Pete.
06:03:19	22	Did you bring any documents today responsive
06:03:24	23	to this request?
06:03:27	24	A What page are we on?
06:03:29	25	Q We're on page 7.

06 00 00	4	
06:03:30	1	A Let me get there. Let me see.
06:03:32	2	Did I bring any of these documents?
06:03:56	3	Q Yes.
06:03:56	4	A No.
06:03:57	5	Q Did you search for any of these documents?
06:04:03	6	A I don't remember.
06:04:05	7	MS. DIXON: I would object to the extent that
06:04:06	8	they're work product, attorney-client privilege.
06:04:09	9	MS. HAYRAPETIAN: Okay. Thanks.
06:04:10	10	BY MS. HAYRAPETIAN:
06:04:11	11	Q Are you saying you did not look for any of the
06:04:15	12	documents requested here?
06:04:17	13	A I didn't say that. I said, "I don't
06:04:18	14	remember."
06:04:19	15	Q You don't remember. Okay.
06:04:20	16	Do you remember what you did to look for the
06:04:22	17	documents here?
06:04:24	18	A Again, I don't remember.
06:04:26	19	Q What devices did you search?
06:04:32	20	A Are you talking to me again?
06:04:33	21	Q Yes.
06:04:34	22	A I don't remember.
06:04:34	23	Q How many cell phones do you have?
06:04:37	24	A When you say "cell phones," do you mean mobile
06:04:41	25	phones? What type of cell phones?

06:04:43	1	Q What kind of cell phones are you aware of that
06:04:45	2	exist?
06:04:48	3	A Satellite phones. Is that a cell phone? They
06:04:53	4	have those rapid radios now. Those are good.
06:04:57	5	Q Okay. Do you use either of those things to
06:05:00	6	text and communicate with the defendant?
06:05:05	7	A Who is the defendant?
06:05:07	8	Q Milagro Cooper, your former client.
06:05:11	9	A I don't know.
06:05:12	10	Q Okay. Did you search your mobile device for
06:05:14	11	communications with Ms. Cooper?
06:05:16	12	A I don't remember.
06:05:18	13	Q Did you check your personal emails for
06:05:23	14	communications with Ms. Cooper?
06:05:25	15	A I don't remember.
06:05:26	16	Q Did you check your social media accounts for
06:05:33	17	communications with Ms. Cooper?
06:05:35	18	A I don't remember.
06:05:36	19	Q Did you check your banking apps for financial
06:05:42	20	transfers with or regarding Ms. Cooper?
06:05:50	21	A Financial apps for I don't even know what
06:05:52	22	you are talking about.
06:05:53	23	Q Did you look at your bank accounts to see if
06:05:55	24	there were any money transfers to or from Ms. Cooper?
06:06:01	25	A No. I don't remember.

06:06:05 2 A I said, "No, I don't remember."  06:06:07 3 Q Okay. So we have I'm just going to try  06:06:12 4 streamline. We have seven requests. We went through  06:06:14 5 the first one. And you did not search for documents;  06:06:17 6 right?  06:06:18 7 A I said, "I don't remember."  06:06:19 8 Q Okay. All documents and communications  06:06:22 9 between you and Sonstar Peterson that refer or related  06:06:25 10 Did you search for documents?  06:06:28 12 A Again, I said, "I don't remember."	1
06:06:12 4 streamline. We have seven requests. We went through 06:06:14 5 the first one. And you did not search for documents of 06:06:17 6 right?  06:06:18 7 A I said, "I don't remember."  06:06:19 8 Q Okay. All documents and communications  06:06:22 9 between you and Sonstar Peterson that refer or related 06:06:25 10 defendant.  06:06:25 11 Did you search for documents?	1
06:06:14 5 the first one. And you did not search for documents; 06:06:17 6 right? 06:06:18 7 A I said, "I don't remember." 06:06:19 8 Q Okay. All documents and communications 06:06:22 9 between you and Sonstar Peterson that refer or relate defendant. 06:06:25 10 Did you search for documents?	
06:06:17 6 right?  06:06:18 7 A I said, "I don't remember."  06:06:19 8 Q Okay. All documents and communications  06:06:22 9 between you and Sonstar Peterson that refer or related defendant.  06:06:25 10 Did you search for documents?	
06:06:18 7 A I said, "I don't remember." 06:06:19 8 Q Okay. All documents and communications 06:06:22 9 between you and Sonstar Peterson that refer or relate 06:06:25 10 defendant. 06:06:25 11 Did you search for documents?	: to
06:06:19 8 Q Okay. All documents and communications 06:06:22 9 between you and Sonstar Peterson that refer or relate 06:06:25 10 defendant. 06:06:25 11 Did you search for documents?	to
06:06:22 9 between you and Sonstar Peterson that refer or related 06:06:25 10 defendant.  06:06:25 11 Did you search for documents?	to
06:06:25 10 defendant. 06:06:25 11 Did you search for documents?	e to
06:06:25 11 Did you search for documents?	
06:06:28 12 A Again, I said, "I don't remember."	
06:06:30 13 Q All documents and communications between you	u
06:06:32 14 and Daystar Peterson that refer or relate to defendar	ıt.
06:06:35 15 Did you search for those documents and	
06:06:37 16 communications?	
06:06:38 17 A Again, I don't remember.	
06:06:41 18 Q All documents and communications that refer	or
06:06:43 19 relate to any payments and/or items of value given to	)
06:06:47 20 defendant.	
06:06:47 21 Did you search for those documents and	
06:06:50 22 communications?	
06:06:51 23 A Again, I don't remember.	
06:06:52 24 Q All documents and communications that refer	or
06:06:54 25 relate to any payments and/or items of value given to	)

06:06:58	1	defendant's family.
06:06:59	2	Did you search for
06:07:01	3	A Again, I do not remember.
06:07:03	4	Q My question was not done. But did you search
06:07:05	5	for documents responsive to that request?
06:07:06	6	Let me guess, you don't remember.
06:07:11	7	MR. HAYDEN: Objection. Argumentative.
06:07:13	8	MS. HAYRAPETIAN: Let's take a 10-minute
06:07:14	9	break.
06:07:16	10	THE VIDEOGRAPHER: The time is 6:07 PM.
06:07:18	11	Pacific time. We are now off the record.
06:07:30	12	(Recess was taken.)
06:35:04	13	THE VIDEOGRAPHER: The time is 6:35 PM
06:35:14	14	Pacific time. We are back on the record.
06:35:15	15	BY MS. HAYRAPETIAN:
06:35:17	16	Q Before I do my final admonitions, I should
06:35:19	17	ask, does anyone have questions they want to ask the
06:35:22	18	witness?
06:35:26	19	MR. HAYDEN: I don't have any.
06:35:27	20	MS. DIXON: I don't have any.
06:35:29	21	MS. HAYRAPETIAN: Okay.
06:35:29	22	BY MS. HAYRAPETIAN:
06:35:30	23	Q Mr. McDowell, in a week or so you will be
06:35:32	24	given the transcript to review to make sure that it
06:35:35	25	accurately reflects what you said here today. Your

06:35:38	1	attorney will provide that to you, and it will also
06:35:40	2	include the exhibits. You can make any changes that you
06:35:44	3	think are necessary to ensure that the transcript
06:35:47	4	accurately reflects what you say here today what you
06:35:49	5	said here today. There will be a corrections form at
06:35:52	6	the end of the transcript where you can fill out any
06:35:55	7	such changes.
06:35:55	8	If you make any substantive changes to your
06:35:58	9	testimony, such as changing a "Yes" to a "No," or by
06:36:01	10	writing in additional words or sentences, anyone can
06:36:04	11	comment on that to the judge or jury, as indicating that
06:36:07	12	you are not a credible witness.
06:36:09	13	Do you understand?
06:36:10	14	A Yes.
06:36:11	15	Q Anyone can ask the judge or jury to disregard
06:36:15	16	any substantive changes you made to the transcript and
06:36:17	17	rely solely on what the transcript said before you
06:36:21	18	received it.
06:36:21	19	Do you understand?
06:36:23	20	A Yes.
06:36:24	21	Q And, as a reminder, given your company
06:36:26	22	previously represented Ms. Cooper, you are everyone
06:36:31	23	at your company is still bound by the protective order
06:36:34	24	that is entered in this case, and all the documents and
06:36:39	25	conversations we had today are so protected under that

06:36:45	1	protective order.
06:36:46	2	Do you understand?
06:36:48	3	A No.
06:36:49	4	Q What don't you understand?
06:36:51	5	A What you just said.
06:36:52	6	Q Okay. So we can I can show it to you.
06:37:01	7	MS. HAYRAPETIAN: Let's add this as an
06:37:03	8	exhibit. It's 118.
06:37:18	9	(Exhibit 118 was marked for identification.)
06:37:29	10	BY MS. HAYRAPETIAN:
06:37:29	11	Q I will represent that it is an order signed by
06:37:33	12	the judge in this case after the parties
06:37:37	13	specifically, Mr. Hayden, and Mr. Pancier, and our
06:37:44	14	firm negotiated which is just a standard protective
06:37:48	15	order, and the parties have been bound by this
06:37:54	16	protective order. And I was merely explaining that
06:38:00	17	given your firm previously represented Ms. Cooper, your
06:38:06	18	company continues to be bound by its language.
06:38:09	19	Do you understand that?
06:38:12	20	A Is the company that leaked the audio to the
06:38:15	21	media are they in here? Are they bound to this too?
06:38:17	22	Or no, just us?
06:38:19	23	MS. HAYRAPETIAN: I have no idea what you're
06:38:20	24	talking about.
06:38:20	25	MR. HAYDEN: This just pertains to us.

JOB NO. 1837675

06:38:22 1 THE WITNESS: Oh, okay. BY MS. HAYRAPETIAN: 06:38:23 06:38:24 3 And that while my questioning for today has 0 06:38:30 4 concluded, I have to keep the deposition open, given 06:38:34 5 from the very beginning of my very first question, the 06:38:39 witness had made clear he was not going to cooperate 6 today and said it would not go well; and that he 06:38:42 7 06:38:47 indicated in every way, including with his words, that 8 9 he had no intention of providing substantive and 06:38:50 06:38:53 10 truthful responses; and I think the transcript reflects 06:38:58 that today with the hundreds of "I don't knows" and "I 11 don't remembers." 06:39:00 12 06:39:01 13 And even, after the very first question, when 06:39:06 14 I asked for other names, I was refused a response; and 06:39:12 15 it was only after I stepped out to consider calling the 06:39:15 judge and came back, that my questions began to get some 16 06:39:23 17 words, although they were not substantive responses. 06:39:27 18 And throughout the entire depo, I believe the witness was generally rude, disrespectful, and did 06:39:31 19 06:39:37 20 everything to undermine the discovery and obstruct 06:39:41 this -- this deposition. And I reserve plaintiff's 21 right to seek relief from the court and come back, if we 06:39:46 2.2 06:39:50 23 need to. 06:39:50 24 And, with that, thank you for your time, 06:39:55 25 Mr. McDowell.

06:39:57	1	THE VIDEOGRAPHER: If there's nothing further,		
06:39:59	2	before going off the record, Counsel Dixon, transcript		
06:40:02	3	or video order for you, ma'am?		
06:40:04	4	MS. DIXON: No. No, thank you.		
06:40:06	5	MR. HAYDEN: Okay.		
06:40:06	6	THE VIDEOGRAPHER: Counsel Hayden, transcript		
06:40:07	7	or video order for you, sir?		
06:40:09	8	MR. HAYDEN: Yes. The witness is requesting		
06:40:11	9	one for us, yes.		
06:40:14	10	THE VIDEOGRAPHER: But no video, sir?		
06:40:16	11	MR. HAYDEN: No video order.		
06:40:16	12	THE VIDEOGRAPHER: And, Counsel Hayrapetian,		
06:40:18	13	would you like the video synced with the transcript?		
06:40:20	14	THE WITNESS: I want the video.		
06:40:21	15	MR. HAYDEN: You want the video?		
06:40:21	16	I take that back. He wants the video as well.		
06:40:24	17	THE VIDEOGRAPHER: Would you like the video		
06:40:25	18	synced with the transcript?		
06:40:27	19	MR. HAYDEN: Yes, that would be good.		
06:40:28	20	THE VIDEOGRAPHER: And, Counsel Hayrapetian,		
06:40:30	21	would you like the video synced with the transcript?		
06:40:33	22	MS. HAYRAPETIAN: Yes, please. And I would		
06:40:34	23	like a rough as well.		
06:40:35	24	THE VIDEOGRAPHER: Okay. That ends Volume I		
06:40:37	25	of the video deposition of Ceasar McDowell. The time is		

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06:40:42	1	6:40 PM Pacific time. We are now off the record.
06:40:44	2	(Proceedings concluded at 6:40 PM.)
06:40:55	3	
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1	DECLARATION UNDER PENALTY OF PERJURY
2	
3	I, the undersigned, declare under penalty of
4	perjury that I have read the entire foregoing transcript
5	of my deposition or the same has been read to me, and
6	the same is true and accurate, save and except for
7	changes, corrections, additions or deletions indicated
8	by me on the DEPOSITION ERRATA SHEET hereof, with the
9	understanding that I offer these changes as if still
10	under oath.
11	
12	Signed on the day of, 20,
13	at
14	(City) (State)
15	
16	
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19	
20	CEASAR MCDOWELL
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1	I, RONNY ZAVOSKY, CSR No. 12359, certify that
2	the foregoing proceedings were taken before me at the
3	time and place therein set forth, at which time the
4	witness was duly sworn and that the transcript is the
5	true record of the testimony so given;
6	
7	Witness review, correction and signature;
8	(X) shall be per venue code ( ) was requested
9	( ) was not requested ( ) was waived
10	( ) not handled by the deposition officer due to
11	party stipulation
12	
13	The dismantling, unsealing, or unbinding of
14	the original transcript will render the reporter's
15	certificate null and void.
16	I further certify that I am not financially
17	interested in the action, and I am not a relative or
18	employee of any attorney of the parties, nor of any of
19	the parties.
20	Dated this 1st day of August, 2025.
21	
22	#30W05K11 _
23	RONNY ZAVOSKY, CSR NO. 12359
24	CERTIFIED SHORTHAND REPORTER
25	

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25	CEASAR MCDOWELL

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C. MCDOWELL 07.25.25

Exhibit 76
RONNY ZAVOSKY



### CEASAR MCDOWELL - CO-FOUNDER & CEO

Ceasar McDowell is the Co-Founder & CEO of Unite The People Inc., a nonprofit organization dedicated to social justice advocacy and legal assistance for incarcerated and formerly incarcerated individuals. He also serves as the Vice President of the Southern California Black Chamber of Commerce, Long Beach Chapter. In addition to his legal advocacy work, McDowell operates UTP Sober Living Homes & Transitional Housing, providing safe, structured housing and support services for individuals in recovery and reentry. As a proud member of the Sober Living Coalition, he is committed to helping people rebuild their lives and reintegrate into society successfully.

Born and raised in Rialto, California, McDowell grew up in a family deeply involved in the justice system, helping his father build 24/7 Bail Bonds into one of the state's leading bail bond companies. His early exposure to the legal system shaped his lifelong commitment to justice and legal advocacy.

While incarcerated at San Quentin State Prison for 20 years, McDowell became a mentor and conviction consultant, guiding his peers through legal challenges. He earned AS and AAS degrees from Palos Verdes Community College, participated in computer coding programs, and registered screenplays with The Writers Guild of America. His story was also featured in Netflix's documentary "Q-Ball", which explores the San Quentin basketball squad and the lives of its incarcerated players.

Since his release, McDowell has been a driving force in legislative change and social reform. Under his leadership, Unite The People Inc. played a key role in drafting a portion of Governor Newsom's California Budget Act of 2020, securing 12 weeks of positive programming credits for qualifying CDCR inmates during the COVID-19 pandemic. Working with Senator Nancy Skinner and Advisory Board member Marvin Deon, this initiative helped thousands of incarcerated individuals.

Beyond his legal advocacy, McDowell works closely with Pacific Gateway, a disadvantaged youth program in Long Beach, helping young people develop essential skills and access opportunities for success.

Currently, McDowell is leading Unite The People Inc.'s statewide campaign to abolish sentencing enhancements, working alongside organizations such as Athletes for Impact and The Weldon Project. As the organization expands, he is spearheading the opening of a second office in Philadelphia, further extending its reach and advocacy efforts.

Throughout his career, McDowell has collaborated with Tiffany Haddish, Senator Nancy Skinner, Tom Sizemore, Weldon Angelos, and many other advocates who share his passion for justice reform.

Today, McDowell remains deeply involved in the daily operations of Unite The People Inc., working tirelessly to address systemic injustices, empower communities, and drive meaningful legislative change.

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Hello,

My name is Ceasar McDowell, CEO of Unite The People. As you may know, Grammy Award-nominated artist and philanthropist Tory Lanez is a three year member of the advisory board for our organization. As a whole, we stand for fighting against social injustices including the prosecution of innocent people. As you also know, Tory is currently on trial and being egregiously accused of something he did not do. Keeping in line with our common goals, mission and reform efforts, all areas that Tory has avidly aided Unite The People inc phyiscally and monetarily, we would love for all of you, his friends, family and fans, to rally and show a united front to protest these charges. If you are available, please meet us tomorrow at Los Angeles court house 210 w temple Los Angeles at 10am. Signs and other materials will be provided for you to join us in support of our brother and fellow advocate. I look forward to seeing you tomorrow and continuing to fight for our overall cause.

Sincerely,
Ceasar McDov/ell
CEO, Unite The People
IG:@ceasar\_mcdowell
unitethepeople.org (http://unitethepeople.org/)
IG: @unitethepeopleusa (https://www.instagram.com/unitethepeopleusa/)



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unitethepeopleusa 136w Hello,

My name is Ceasar McDowell, CEO of Unite The People. As you may know, Grammy Award-nominated artist and philanthropist Tory Lanez is a three year member of the advisory board for our organization. As a whole, we stand for fighting against social injustices including the prosecution of innocent people. As you also know, Tory is currently on trial and being egregiously accused of something he did not do. Keeping in line









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December 13, 2022

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C. MCDOWELL 07.25.25 **Exhibit 77** 

RONNY ZAVOSKY

Instagram Log In Sign Up







# NITE THE PEOP **ESS CONFEREN** A. CALIFORN



DRY LANEZ SHOOTING CAS PDATE AND NEW EVIDENC





### IMMEDIATE RELEASE

Evidence in Tory Lanez Case to Be Unveiled at Press Conference-Wednesday May 1025

angeles, CA — On Wednesday May  $14^{th}$  at 10am Members of the media are invited to 1a critical press conference where newly revealed, exculpatory evidence will be revealed in se of Daystar Peterson, known to the public as Tory Lanez.

gal team at Unite The People will present key evidence that could significantly impact understanding of the case and raise important questions about the legal process and me. This material is expected to bring new context and clarity to one of the most high- elegal cases in recent memory.

is about transparency, justice, and the right to a fair legal process," said a representative the legal team. "We believe the public and the press have a right to see this material, and to stand its weight."

wing the violent stabbing of Tory Lanez that occurred yesterday, there are now ple matters that must be addressed with the media. This press conference will not only ight on newly revealed evidence, but also provide an update on Tory's condition and the er implications of recent events.

growing calls for Governor Gavin Newsom and the broader legal com-se, this event marks a pivotal moment in the fight for due process.

IA ATTENDANCE IS STRONGLY ENCOURAGED.

Date: Wednesday, May 14, 2025

Location: Downown LA (Address Will be given upon approval)

Media Contact: Info@UniteThePeople.org

ntialed members of the piess will receive access to the evidence, legal commentary, and sting materials. RSVP required to attend,

# Stand By....#freetorylanez



ory was stabbed 14 times – including nnouncement about to drop unds to his back, 4 to his torso, 2 to k of his head, and 1 to the left side of . Both of his lungs collapsed, and he ed on a breathing apparatus. He is athing on his own. Despite being in p is talking normally, in good spirits, a eeply thankful to God that he is pullir ough. He also wants to thank everyo their continued prayers and suppo

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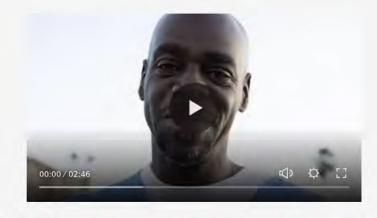
## Unite The People Inc.: "IN THE MEDIA"

THIS PAGE FEATURES ALL OF THE NEWS OUTLETS, PODCASTS, RADIO STATIONS, ETC. THAT UNITE THE PEOPLE INC. IS FEATURE ON! CLICK ON THE TITILE, TAKE A LOOK, AND SHARE YOUR FAVORITE ARTICLE!

### SPECTRUM NEWS: ALLAN MCINTOSH

"I'm probably the happiest man on Earth right now."-Allan McIntosh

After spending 20+ years incarcerated and isolated from his family for gun possession, Allan McIntosh has finally been resentenced and freed.



# AN INTERVIEW WITH UNITE THE PEOPLE'S CEO, CEAS MCDOWELL

### UCLA RADIO - AN INTERVIEW WITH UNITE THE PEOPLE'S CEO, CEASAR MCDOWELL

"Unite the People here, how can I help you?"

14 years into his prison sentence — three life sentences for a nonviolent crime - Ceasar McDowell founded Unite the People, a non-profit organization providing legal services for low-income communities in California, right from his cell at San Quentin State Prison. By working with his brother on the outside, he built a website, filed paperwork, and took company calls on a contraband cell-phone.

SIGNAL TRIBUNE - "FORMER LA PROSECUTOR JOINS LONG BEACH-BASED LEGAL NONPROFIT TO FIGHT FOR INCARCERATED PEOPLE"

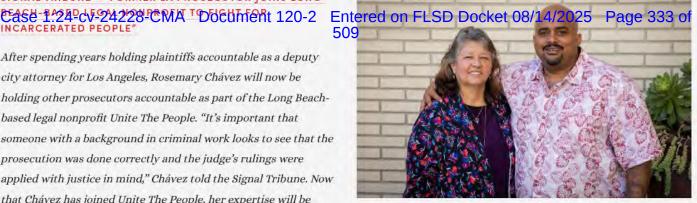
After spending years holding plaintiffs accountable as a deputy city attorney for Los Angeles, Rosemary Chávez will now be holding other prosecutors accountable as part of the Long Beach-



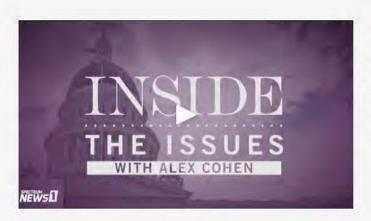
SIGNAL I KIBUNE - FUKMEK LA PKUSECUTUK JUINS LUNG

# INCARCERATED PEOPLE

After spending years holding plaintiffs accountable as a deputy city attorney for Los Angeles, Rosemary Chávez will now be holding other prosecutors accountable as part of the Long Beachbased legal nonprofit Unite The People. "It's important that someone with a background in criminal work looks to see that the prosecution was done correctly and the judge's rulings were applied with justice in mind," Chávez told the Signal Tribune. Now that Chávez has joined Unite The People, her expertise will be available to people who otherwise couldn't afford it.



Rosemary Chavez poses for a portrait with Cesar McDowell, CEO of Unite the People, outside their office on Feb. 10, 2022. Chavez is a former deputy city attorney for Los Angeles and will now be working with the non-profit organization to help free people incarcerated. (Richard H. Grant | Signal Tribune)



### SPECTRUM NEWS: INSIDE THE ISSUE

In this special edition of "Inside The Issues" with Alex Cohen, one of Unite The People Inc.'s clients has their story told. Alex Cohen and Daniela Parto of Spectrum News, help share the story of Allan McIntosh and his family; and supplies a real life example of how disproportionate sentencing is still playing a role in our society to this day.

### SPECTRUM NEWS: THE SOCAL SCENE

Our CEO and Co-Founder, Ceasar McDowell, spoke with Spectrum News' "The SoCal Scene", hosted by Melvin Robert and crew, about how the recent uptick in robberies is impacting prison reforms. Make sure to check out the interview from Spectrum News if you have not done so already!





### GEORGE GASCON TALK & CEASAR MCDOWELL SPECTRUM NEWS INTERVIEW

"CEO of Unite The People, Ceasar McDowell, sits down with George Gascon and survivors of violent crimes to discuss what resources should be available to these victims. Listen to this interview by Spectrum News that discusses more of Ceasar's s and what this talk meant to him."



CEO of Unite The People, Ceasar McDowell, sits down with George Gascon and survivors of violent crimes to discuss what resources should be available to these victims. Listen to this interview by Spectrum News that discusses more of Ceasar's story and what this talk meant to him.

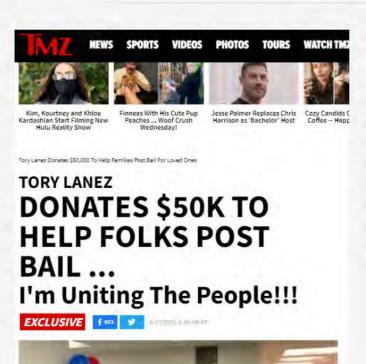
"CEO of Unite The People, Ceasar McDowell, sits down with Entered on FLSD Docket 08/14/2025 Page 334 of 509<sup>George Gascon and survivors of violent crimes to discuss what</sup>

resources should be available to these victims. Listen to this interview by Spectrum News that discusses more of Ceasar's story and what this talk meant to him."

# LONG BEACH POST: RAPPER TORY LANEZ GIVES \$50K TO PAY LEGAL FEES FOR 30 FAMILIES

Canadian rapper, singer-songwriter, and record producer Tory
Lanez stopped by the Unite the People office in Downtown Long
Beach and donated \$50,000 to pay off the legal fees for 30 families
on Friday. Most of the families were completely surprised by his
appearance and gesture. "Going through my own situations, I can
understand how the legal system can be," Lanez said as he spoke
to the families. Lanez has been an advisory board member with
Unite the People for three years and the organization is diligently
working on prison reform. But at this moment, he felt paying off
the legal fees would provide an immediate impact.





# TMZ: TORY LANEZ DONATES \$50K..."I'M UNITING THE PEOPLE!"

Tory Lanez stopped by the Unite the People office in Downtown
Long Beach and donated \$50,000 to pay off the legal fees for 30
families on Friday. Most of the families were completely surprised
by his appearance and gesture. Lanez has been an advisory board
member with Unite the People for three years and the
organization is diligently working on prison reform. But at this
moment, he felt paying off the legal fees would provide an
immediate impact. "People think the goal is to be successful. My
goal is not to be successful. Success is just the platform in which I
help people from," Lanez said.



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Tory Lanez just dropped a fat stack of cash to help dozens of disadvantaged California families post bail for their loved ones through Unite The People Inc.

### LA OPINION: SORPRENDEN A FAMILIAS CON DONATIVO DE \$50,000 PARA PAGAR SERVICIOS LEGALES DE SUS **ENCARCELADOS**

El rapero canadiense Tory Lanez sorprendió a 20 familias de California, al donarles entre \$1,000 y \$5,000 a cada una para que paguen por los servicios legales de sus familiares en prisión, que ya fueron sentenciados. "Para mí, significa el mundo poder ayudarlos", dijo Lanez, quien desde hace tres años es miembro de la directiva de la organización no lucrativa Unite The People, a través de la cual donó \$50,000 para ayudar con el pago de los servicios legales de los encarcelados convictos. El popular rapero recordó a las familias latinas, afroamericanas y asiáticas reunidas para recibir los donativos, que él fue un desamparado a los 14 años, suplicando por dinero en las calles.





### EVERYDAY INJUSTICE PODCAST EPISODE 120: CESAR MCDOWELL TURNS HIS LIFE AROUND AT SAN QUENTIN

Cesar McDowell chronicles his journey from San Quentin to becoming, while still incarcerated, the co-founder and CEO of Unite The People Inc., a non profit organization that promotes social justice and offers affordable legal services throughout the state of California. After spending 20 years in prison and falling victim to the social inequality in our criminal justice system, McDowell founded his organization from his prison cell with the hope of saving all those who have been wrongly prosecuted and sentenced. It is an incredible story of perseverance and redemption and McDowell walks the audience through it. McDowell on Everyday Injustice shares his story about how he spent 20 years incarcerated in one of the CDCR's toughest

Case 1:24-cv-24228-CMA Document 120-2 Entered of the SD Docket 08/14/2025 Pegge 336 of 509sentenced. It is an incredible story of perseverance and redemption and McDowell walks the audience through it.

> McDowell on Everyday Injustice shares his story about how he spent 20 years incarcerated in one of the CDCR's toughest facilities, San Quentin State Prison; under an illegal sentence.

### KHSU: AS CALIFORNIA PREPARES TO RELEASE UP TO 8,000 INMATES, ADVOCATES ASK WHAT'S NEXT

"Until late May, San Quentin had remained untouched by the coronavirus. That quickly changed when a group of 121 incarcerated people from the California Institution for Men in Chino were transferred to the Marin County facility without being tested immediately beforehand." Ceasar McDowell, CEO and Co-Founder of Unite The People Incorporated discussed his experience with COVID-19 while incarcerated at one of California's toughest prisons in San Quentin State Prison.



# PODCAST: How Unite the People is helping people gain their freedom

### LONG BEACH POST PODCAST: HOW UNITE THE PEOPLE IS HELPING PEOPLE GAIN THEIR FREEDOM

This week on the Word on Long Beach we take a closer look at how the nonprofit organization Unite the People Inc. began. Cesar McDowell spent 20 years in prison for a non-violent offense based on California's "three strikes law," which increased prison sentences for those with previous felony convictions. From his prison cell, he started Unite the People Inc., to help people who were in his situation and do not have the means to retain a competent attorney. If you would like to know more or get involved with Unite the People Inc., you can visit their office at 555 E. Ocean Blvd., suite 205. You can call them at 888-245-9393 or, you donate or learn more via their website.



### **KQED: CALIFORNIA PREPARES TO RELEASE UP TO 8,000** INMATES

Ceasar McDowell was released from San Quentin State Prison on June 26, his pre-scheduled release date - unrelated to the coronavirus — after serving a 20-year sentence on a three strikes violation. The 46-year-old from Rialto, California spent his last four days in the prison's COVID-19 ward, even though he had no symptoms and never received the results of the coronavirus test he had taken as a "just-in-case" measure, he said. McDowell said those final days - sitting in a cell with men coughing all around him — were some of the most brutal of his entire incarceration.





### REVOLVE IMPACT'S EXPANDING EMPATHY (TOWN HALL MEETING)

On Tuesday, March 30th, Revolve Impact, Summit, Athletes for Impact, and Unite The People Inc., brought together George Gascón, Los Angeles District Attorney; Ceasar McDowell, CEO & Co-Founder of Unite the People; and Professional Soccer Player, Megan Rapinoe, for a discussion on the role of survivors and systems-impacted people in the re-imagining of and the building of a new justice system. For more information on this event, visit the "Our Work" tab, at the top of our page.

### SIGNAL TRIBUNE (INTERVIEW & ARTICLE)

"Three-strikes law keeps Long Beach man in prison for 22 years on nonviolent charge." "Ceasar McDowell poses with a picture of his mug shot from when he was arrested in 2000 in the office of his non-profit organization Unite the People in Long Beach on July 6, 2021. On his wall are photos from prison and other accomplishments he has made since getting out... As of Wednesday, June 30. McDowell's nonprofit organization Unite the



nonviolent charge." "Ceasar McDowell poses with a picture of his Charge no 1 from Whe 1 to 200 and the Office of his non-profit organization Unite the People in Long Beach on July 6, 2021. On his wall are photos from prison and other accomplishments he has made since getting out... As of Wednesday, June 30, McDowell's nonprofit organization Unite the People has gathered 29,144 signatures on an online petition to get McIntosh resentenced by the Los Angeles County District Attorney's Office."

# nonviolent charge." "Ceasar McDowell poses with a picture of his Case 1 i24 CV-24 228 CMA in 2000 in the office of the Entered on FLSD Docket 08/14/2025. Page 338 of in prison for 22 years on nonviolent charge." "Ceasar McDowell poses with a picture of his Three-strikes law keeps Long Beach man Entered on FLSD Docket 08/14/2025. Page 338 of in prison for 22 years on nonviolent charge." "Ceasar McDowell poses with a picture of his Three-strikes law keeps Long Beach man Entered on FLSD Docket 08/14/2025. Page 338 of in prison for 22 years on nonviolent charge." "Ceasar McDowell poses with a picture of his Three-strikes law keeps Long Beach man Entered on FLSD Docket 08/14/2025. Page 338 of in prison for 22 years on nonviolent charge."

BY KRISTEN FARRAH NASEMI, STAFF WRITER - 7010 8-202



Casser McDowell poses with a picture of line mug shick from when ne was arrested in 2000 in the office of his non-profit organization briller the Rendo in Long Souch in Lloy 9, 2011. The rise wall are profite from prison and other accomplicitionants for his made since gotting and Dischord N. Caroli. Stress H. Toward S. Sanda H. Sanda



### HIP HOP ZONE RADIO (INTERVIEW)

In December 2020, Ceasar McDowell sat down with Hip Hop Zone and discussed his time incarcerated, how he started the organization, and the organization's plans for the future. This interview provides an in depth look at the origin of Unite The People Inc.!

### UNIVISION: THREE STRIKES PROTEST

Unite the People, formally known as "We the People Org," formed a protest in the city of Los Angeles to take a stand against the various issues surrounding our criminal justice system. Mass incarceration in America is an epidemic, and has become a burden on families and taxpayer dollars. Unite the People, organizers of The People's Fair Sentencing and Public Safety Act of 2018, hopes to eradicate the Three Strikes Law. The organization hopes to push many other prison and sentence reforms.



Formerly incarcerated activists demand Gov.

94.1 KPFA: FORMERLY INCARCERATED ACTIVISTS DEMAND



Formerly incarcerated activists demand Gov. Newsom visit San Quentin & see dangerous conditions himself; Plus, faith leaders plan Black Lives Matter Sabbath Weekend

LISTEN DOWNLOAG OPEN IN ITUNES



es hold a press conference outside San Quentin State Prison on Thursday. Photo from Fllo

### 94.1 KPFA: FORMERLY INCARCERATED ACTIVISTS DEMAND GOV. NEWSOM VISIT SAN QUENTIN

Thursday, activists with the #StopSanQuentinOutbreak campaign held a press conference outside of the prison to call on Gov. Gavin Newsom to release incarcerated people with nonviolent convictions to slow the spread of the virus inside the prison, which is dangerously overcrowded. We spoke with Ceasar McDowell, who is now working with Unite the People, a nonprofit organization promoting social justice and providing affordable legal services for disadvantaged communities.

### LOCKED IN: BREAKING BREAD PODCAST

Locked in is a grassroots organization comprised of people passionate about social justice and wanting to make lasting change for those affected by injustice. Locked In is focused primarily on 3 pillars: Communication, Education, & Action. In our podcast Break Bread, host Dee Marie sits down at the table and has meaningful conversations with people who have been affected by the justice system and those that are active in reform.

"It is official, Season 2 is out and what an episode to drop with! Ceasar gets real and shares so many stories and truth nuggets with DeeMarie. Some of what he talks about are why he started robbing and how he got 3 strikes for doing nothing, how it was being in San Quentin at the height of Covid, and how he started his non-profit Unite the People from his prison cell. This episode is so good we had to go longer than usual."





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Advocates hold a press conference outside San Quentin State Prison on Thursday. Photo from Ella Baker Center

### LOCKED IN: BREAKING BREAD PODCAST

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C. MCDOWELL 07.25.25 Exhibit 80

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org.20230601.gappssmtp.com header.s=20230601
header.b=DwLQeyp0;
       spf=neutral (google.com: 209.85.220.41 is neither
permitted nor denied by best quess record for domain of
jaz@unitethepeople.org) smtp.mailfrom=jaz@unitethepeople.org
DKIM-Signature: v=1; a=rsa-sha256; c=relaxed/relaxed;
        d=unitethepeople-org.20230601.gappssmtp.com;
s=20230601; t=1709084638; x=1709689438; dara=qooqle.com;
        h=to:subject:message-id:date:from:in-reply-
to:references:mime-version
         :from:to:cc:subject:date:message-id:reply-to;
        bh=IPr2KzLABUK00SWS9AhZRqAPRnO6F7WU6JjoOUq7Cf4=;
b=DwLQeyp0jZ2I7xEWBvvnJWqHyO4B9GUdk9H8wlS9s7/i7P3h4cGk70XjtrA
vU4Y+Vd
fIBwZF170DR2dIAE0MxH0Plz6p5YyTrnlEKRlUr/H8fy9n+2o38IgMqEpuNvo
DXeYS1K
G+8YgcIcmit7yAxCnfzDmHTWUHa81MvDug58Ypt3gpVxYOS5zRQdMni6Q3sTa
wuV80R7YNyxuj3LVFkkFlQAhGPqcHfhdToX3p0sfZq6+TkSA5hjLYw3OwbcQR
76he76G
eBy8PiztFQnuSn/AGedSi2bt/gMpIBI1dWYyNx8A8kVsx3cH70V97hjMNSMZu
6iJ1yer
         rYWq==
X-Google-DKIM-Signature: v=1; a=rsa-sha256;
c=relaxed/relaxed;
        d=1e100.net; s=20230601; t=1709084638; x=1709689438;
        h=to:subject:message-id:date:from:in-reply-
to:references:mime-version
         :x-qm-message-state:from:to:cc:subject:date:message-
id:reply-to;
        bh=IPr2KzLABUK00SWS9AhZRqAPRnQ6F7WU6JjoOUq7Cf4=;
b=HVVxHOCWG47i0VC4jMMNqoR6Lw8SqouAbqcD6p6vnx7XJxFQKEVMUJ5GPT7
PJBZH/H
DtIE2wToRqUWr/zDu/qCwvQGMBDKkvYjvNRpZpjzY4SjY+wzokWqmVeuzSoOq
n1ackav
TN6Cq79y2Brot/bicjgU8+dXdiPH47OJg6Nv7q3FMf7sp2CxCgjPTqJH/bbw6
JwezAT7
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alnStcG
```

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qLfih9q
         4QcA==
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AOJu0YyhZDBbQmuYikbTUMChXvCUmn6uZzitRyzr88o0mhjOWYJK8LOU
9wEOkt/hdC13vybOHbVL16+X1oepnv3vkZdhuDk7o8VmQpk/oVVv7YkBfMDjx
Rd3v4alef0TFL+
hGbT78V8/qZw7CV00/VEyHw3YP00U8MB0Lp9dpkqjH7xK2v7J
X-Google-Smtp-Source:
AGHT+IG+U7UwYPBXy75Jq4WMmVQ9ELAaAXVZ0quzJMGWPj4VyOO+yjwJYZoFC
IGkyriKNy7X4PlhjSHKu+Xjjn65lC8=
X-Received: by 2002:a5d:5f8d:0:b0:33d:ca56:a616 with SMTP id
dr13-
20020a5d5f8d000000b0033dca56a616mr7371301wrb.36.1709084637031
; Tue, 27 Feb 2024 17:43:57 -0800 (PST)
MIME-Version: 1.0
References: <CAEqU2UqA9v1+gxUoMJWg1q tXgJo3NZhiG-
4xSNweEC2wzbrDQ@mail.gmail.com>
In-Reply-To: <CAEqU2UqA9v1+qxUoMJWq1q tXqJo3NZhiG-
4xSNweEC2wzbrDO@mail.gmail.com>
From: Jazmyne Jamison <jaz@unitethepeople.org>
Date: Tue, 27 Feb 2024 17:43:43 -0800
Message-ID: <CABGSRjnhqRHsyf7v+WSmQ58C=dxAL-
1NrtCHwzB8u+V+h5s8qA@mail.gmail.com>
Subject: Fwd: Peterson Filed AOB UTP.pdf
To: milagrogramz@
                           tia@teawithtia.org,
torylanezdaily@
Content-Type: multipart/mixed;
boundary="0000000000000aea7c1061267464b"
--0000000000000aea7c1061267464b
Content-Type: multipart/alternative;
boundary="0000000000000aea7c00612674649"
--0000000000000aea7c00612674649
Content-Type: text/plain; charset="UTF-8"
Here you go!
Thank you,
Jaz
888-245-9393
Unite The People, Inc.
555 E. Ocean Blvd Suite 205
Long Beach, CA 90802
----- Forwarded message -----
From: Ceasar McDowell <ceasar mcdowell@unitethepeople.org>
Date: Tue, Feb 27, 2024 at 5:41 PM
Subject: Peterson Filed AOB UTP.pdf
```

```
To: <jaz@unitethepeople.org>
--0000000000000aea7c00612674649
Content-Type: text/html; charset="UTF-8"
Content-Transfer-Encoding: quoted-printable
<div dir=3D"auto">Here you go!<br clear=3D"all"><br</pre>
clear=3D"all"><div><div=</pre>
 dir=3D"ltr" class=3D"qmail signature" data-
smartmail=3D"gmail_signature">T=
hank you, <br>Jaz<br>888-245-9393<br>Unite The People,
Inc.<br>555 E. Oc=
ean Blvd Suite 205<br/>br>Long=C2=A0Beach, CA 90802</div></div>
</div><div><br><=
/div><div><div class=3D"qmail quote"><div dir=3D"ltr"
class=3D"qmail at=
tr">----- Forwarded message ------br>From: <strong
class=3D"gmail_=
sendername" dir=3D"auto">Ceasar McDowell</strong> <span</pre>
dir=3D"auto"><<a=
href=3D"mailto:ceasar_mcdowell@unitethepeople.org">ceasar_mcd
owell@uniteth=
epeople.org</a>&qt;</span><br>Date: Tue, Feb 27, 2024 at 5:41
PM<br>Subject=
: Peterson Filed AOB UTP.pdf<br/>
<br/>
%lt;<a
href=3D"mailto:jaz@unitethepeop=
le.org">jaz@unitethepeople.org</a>&gt;<br></div><br>
</div></div>
--0000000000000aea7c00612674649--
--0000000000000aea7c1061267464b
Content-Type: application/pdf; name="Peterson_Filed
AOB UTP.pdf"
Content-Disposition: attachment; filename="Peterson Filed
AOB UTP.pdf"
Content-Transfer-Encoding: base64
Content-ID: <18ded5fc2a956f85df91>
X-Attachment-Td: 18ded5fc2a956f85df91
--0000000000000aea7c1061267464b--
```

### Original Message

C. MCDOWELL 07.25.25 **Exhibit 81** 

Message ID	<canmgtofpamf4mk5rm3nsbskphpngq2qb6oa=amwbuugqkprjra@mail.gmail.com></canmgtofpamf4mk5rm3nsbskphpngq2qb6oa=amwbuugqkprjra@mail.gmail.com>
Created at:	Sun, Aug 4, 2024 at 10:00 PM (Delivered after 14 seconds)
From:	Jaz Jamison <jaz@unitethepeople.org></jaz@unitethepeople.org>
То:	MilagroGramz@
Subject:	Fwd: Daystar Peterson - Atty General's Reply Brief
SPF:	NONE with IP 209.85.220.41 Learn more
DKIM:	'FAIL' with domain unitethepeople-org.20230601.gappssmtp.com (unaligned From and DKIM domains) Learn more

**Download Original** 

Copy to clipboard

```
Xm
NTM22981NmTlxJxxIrndk7as2EB8tr7xH/9Dx8aKrCvRYIzzqtvCCi1lGoDrF/G2h+
         4L+O==
ARC-Message-Signature: i=1; a=rsa-sha256; c=relaxed/relaxed;
d=google.com; s=arc-20160816;
        h=to:subject:message-id:date:from:in-reply-
to:references:mime-version
         :dkim-signature;
        bh=fcu10m/rTX6q0qx9HLRt4qThbWo1MhrT3bcf5yNLHv0=;
        fh=no0xgP1fYDc2oqCIf1Aj1Jg168Ou6ShUSMvkruuXD2U=;
b=KIsSOSUCMt/QrLiUbeRslk6XzFzjT+QRUOHjzrpqtyFGJ+ykdwIbWMPVDSh4ZL3v
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o+KJRVL4vthAjHhCyUBAxNIGBJj3n4rPujG7a/msdW9UdQQFefIKZwrwAmdKDCEdSa
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JM6/wyyacCPamtKMw345wS13WPvFcv5ql6JbVm8J1qD1MSRcp/rAcXJv1vbLaSlqv5
aN
         PFwA==;
        dara=google.com
ARC-Authentication-Results: i=1; mx.google.com;
       dkim=pass header.i=@unitethepeople-
org.20230601.gappssmtp.com header.s=20230601 header.b=2FAETnz6;
       spf=none (google.com: jaz@unitethepeople.org does not
designate permitted sender hosts)
smtp.mailfrom=jaz@unitethepeople.org;
       dara=pass header.i=@gmail.com
Return-Path: <jaz@unitethepeople.org>
Received: from mail-sor-f41.google.com (mail-sor-f41.google.com.
[209.85.220.41])
        by mx.google.com with SMTPS id ada2fe7eead31-
4945daf6a13sor610874137.9.2024.08.04.20.00.48
        for <MilagroGramz@
        (Google Transport Security);
        Sun, 04 Aug 2024 20:00:48 -0700 (PDT)
Received-SPF: none (google.com: jaz@unitethepeople.org does not
designate permitted sender hosts) client-ip=209.85.220.41;
Authentication-Results: mx.google.com;
       dkim=pass header.i=@unitethepeople-
org.20230601.gappssmtp.com header.s=20230601 header.b=2FAETnz6;
       spf=none (google.com: jaz@unitethepeople.org does not
designate permitted sender hosts)
smtp.mailfrom=jaz@unitethepeople.org;
       dara=pass header.i=@gmail.com
DKIM-Signature: v=1; a=rsa-sha256; c=relaxed/relaxed;
        d=unitethepeople-org.20230601.gappssmtp.com; s=20230601;
t=1722826848; x=1723431648; dara=google.com;
        h=to:subject:message-id:date:from:in-reply-
```

```
to:references:mime-version
         :from:to:cc:subject:date:message-id:reply-to;
        bh=fcu10m/rTX6qOqx9HLRt4qThbWolMhrT3bcf5yNLHv0=;
b=2FAETnz6QYuqMX7W5RPpk4pYj4BGsNW71BdA8F+XFXLYnn51cCBaLo4rSW40Phs7
VS
UGXDJLeEplmdtrSVufOddPKq0Fc+Yv26rjOme+5G2u0alN5GZ5Fqb7FTwsOo/BoTJq
ol/+bLuSmhGrY+MsoTTk2LvhX9MYFVy4zWre6TkdFKYA74tnqD4p9hWIs0GqjVv1bi
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10
DazPQDj774voaDymqTmEOzo8YXK5ujUCxpBzzewoQ1NFUwXjSrwbnFV3jIHkggxNRt
qn
         +1va==
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        d=1e100.net; s=20230601; t=1722826848; x=1723431648;
        h=to:subject:message-id:date:from:in-reply-
to:references:mime-version
         :x-qm-message-state:from:to:cc:subject:date:message-
id:reply-to;
        bh=fcu10m/rTX6aOqx9HLRt4aThbWo1MhrT3bcf5vNLHv0=;
b=Ie+sKl+nWGUx2rIwQERUKyAo4Wp6sFYh24v5avaGwMAPsyiZli/zXgY/nQbtlnfs
fs
lMTODZioord0kdYb7xbx83lhzaQESCKPiL4LAZdbIE/h803HyKbuyVMA9It9XmYjEp
YLPOWv2pCttucJBbpFFTgtxZidm4si+qCohqjPqyxnYyd7xwNCwghmCXWqMMxN3ZO2
LGSARqN4rOmFfhElK99j9Qu8rrHPPqNwMdkqVF1+yrchBlz7Q8OhlBAvR3dpq7eujs
JT
tU8RPsecSe+LYd7q1YaQr5wiA2xV9wUpOhe35Vb1NeZ7v+hjfLAFbn20Ceg/f9XkmW
DT
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X-Google-Smtp-Source:
AGHT+IEXhXdjRdyHVtb1WXn2hACclghmAidChoJxVFH77AQbyr8lgttDSsZ6N4nFjL
+Xx6eOsZzXYLXfygeAkJaK+Oo=
X-Received: by 2002:a05:6102:162c:b0:493:dbbc:7d56 with SMTP id
ada2fe7eead31-4945be0a4e3mr6761595137.8.1722826845999; Sun, 04 Aug
2024 20:00:45 -0700 (PDT)
MIME-Version: 1.0
References:
<CAG+ASRzKYsrfvrDotbq9qCNSvdnQ+UFkDQ8UHqYUSs=NF9FrSw@mail.qmail.co
m> <1db2cc10-a900-4a03-9e4c-f7ec51419ae1@unitethepeople.org>
In-Reply-To: <1db2cc10-a900-4a03-9e4c-
```

```
f7ec51419ael@unitethepeople.org>
From: Jaz Jamison < jaz@unitethepeople.org>
Date: Sun, 4 Aug 2024 20:00:34 -0700
Message-ID:
<CANmgTofpaMf4Mk5Rm3NSBsKPHpnGq2QB6oA=AMwBuUqqkPRjrA@mail.qmail.co
Subject: Fwd: Daystar Peterson - Atty General's Reply Brief
To: MilagroGramz@
Content-Type: multipart/mixed;
boundary="0000000000002aa392061ee6e2e8"
--00000000000002aa392061ee6e2e8
Content-Type: multipart/alternative;
boundary="0000000000002aa391061ee6e2e6"
--0000000000002aa391061ee6e2e6
Content-Type: text/plain; charset="UTF-8"
Content-Transfer-Encoding: quoted-printable
Millie,
Please see the attachments below. As they pertain the AG Response
Daystar=E2=80=99s case.
Let me know if you have any questions or concerns.
Blessings, Jaz=F0=9F=92=9A
----- Forwarded message -----
From: Ceasar McDowell <ceasar_mcdowell@unitethepeople.org>
Date: Sun, Aug 4, 2024 at 7:32 PM
Subject: Fwd: Daystar Peterson - Atty General's Reply Brief
To: <jaz@unitethepeople.org>
Get BlueMail for Android <a href="https://bluemail.me">https://bluemail.me</a>
On Jul 29, 2024, at 10:34=E2=80=AFAM, Cynthia DeAngelo
<cynthia@unitethepeo=
ple.org>
wrote:
> Briefs attached.
> Best Regards,
> Cyndi DeAngelo
> Paralegal
> *Unite the People, Inc.*
> *555 E Ocean Blvd Suite 205
```

```
<https://www.google.com/maps/search/555+E+Ocean+Blvd+Suite+205+Lon</pre>
q+Beach=
,+CA+90802?entry=3Dqmail&source=3Dq>Long
> Beach, CA 90802
<https://www.google.com/maps/search/555+E+Ocean+Blvd+Suite+205+Lon</pre>
,+CA+90802?entry=3Dqmail&source=3Dq>*
> *(888)245-9393 <8882459393>*
> *www.unitethepeople.org <http://www.unitethepeople.org/>*
>
--00000000000002aa391061ee6e2e6
Content-Type: text/html; charset="UTF-8"
Content-Transfer-Encoding: quoted-printable
<div dir=3D"auto">Millie,</div><div dir=3D"auto"><br></div><div
dir=3D"auto=
">Please see the attachments below. As they pertain the AG
Response to Days=
tar=E2=80=99s case.</div><div dir=3D"auto"><br></div><div
dir=3D"auto">Let =
me know if you have any questions or concerns.</div><div
dir=3D"auto"><br><=
/div><div dir=3D"auto">Blessings, Jaz=F0=9F=92=9A</div><div><br/>chr>
<div class=
=3D"gmail_quote"><div dir=3D"ltr" class=3D"gmail_attr">------
Forwarded=
message -----<br/>br>From: <strong class=3D"gmail_sendername"</pre>
dir=3D"auto"=
>Ceasar McDowell</strong> <span dir=3D"auto">&lt;<a
href=3D"mailto:ceasar m=
cdowell@unitethepeople.org">ceasar_mcdowell@unitethepeople.org</a>
&qt;</spa=
n><br>Date: Sun, Aug 4, 2024 at 7:32 PM<br>Subject: Fwd: Daystar
Peterson -=
Atty General's Reply Brief<br>To: &lt;<a
href=3D"mailto:jaz@unitethep=
eople.org">jaz@unitethepeople.org</a>&gt;<br></div><br><div
style=3D"zo=
om:0%"><div dir=3D"auto"><br></div>
<div dir=3D"auto">Get <a href=3D"https://bluemail.me"</pre>
target=3D"_blank">Blu=
eMail for Android</a> </div>
<div class=3D"gmail_quote">On Jul 29, 2024, at 10:34=E2=80=AFAM,
Cynthia De=
Angelo <<a href=3D"mailto:cynthia@unitethepeople.org"
target=3D"_blank">=
cynthia@unitethepeople.org</a>&gt; wrote:<blockquote
class=3D"gmail_quote" =
style=3D"margin:0pt 0pt 0pt 0.8ex;border-left-width:1px;border-
left-style:s=
olid;padding-left:1ex;border-left-color:rgb(204,204,204)">
<div dir=3D"ltr">Briefs attached.=C2=A0</div></blockquote></div>
</div><div =
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tr"><br clear=3D"all"><div><br></div><span
class=3D"qmail signature prefix"=
>-- </span><br><div dir=3D"ltr" class=3D"gmail signature" data-</pre>
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0px;padding=
:0px;color:rgb(34,34,34)"><div><div dir=3D"ltr"><span
style=3D"color:rgb(80=
,0,80)"><font face=3D"arial, sans-serif" style=3D"font-
family:arial, sans-se=
rif;color:rgb(80,0,80)"></font><div><font face=3D"arial, sans-
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=3D"font-family:arial,sans-serif;color:rgb(80,0,80)"><font
style=3D"font-fa=
mily:arial, sans-serif; background-
color:rqb(255,255,255);color:rqb(80,0,80)"=
>Best Regards,</font></font></div><font face=3D"arial, sans-
serif" sty=
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style=3D"font-=
family:arial, sans-serif; background-
color:rgb(255,255,255);color:rgb(80,0,80=
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style=3D"f=
ont-family:arial,sans-serif;color:rgb(80,0,80)"><font
style=3D"font-family:=
arial, sans-serif; background-
color:rgb(255,255,255);color:rgb(80,0,80)">Cynd=
i DeAngelo</font></font></div><font face=3D"arial, sans-
serif" style=
=3D"font-family:arial,sans-serif;color:rgb(80,0,80)"><font
style=3D"font-fa=
mily:arial, sans-serif; background-
color:rqb(255,255,255);color:rqb(80,0,80)"=
>Paralegal</font></font></div><font face=3D"arial, sans-
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serif; color: rqb(80,0=
,80)"><font style=3D"font-family:arial,sans-serif;background-
color:rgb(255,=
255,255);color:rgb(80,0,80)"><b style=3D"font-family:arial,sans-
serif">Unit=
e the People, Inc.</b></font></font></div><div><font
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s-serif" style=3D"font-family:arial,sans-
serif;color:rgb(80,0,80)"><strong =</pre>
style=3D"font-family:arial,sans-serif"><font style=3D"font-
family:arial,san=
s-serif; background-color: rqb(255,255,255); color: rqb(80,0,80)" > <a
href=3D"ht=
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each, +CA+=
90802?entry=3Dqmail&source=3Dq" style=3D"font-
family:arial,sans-serif">=
555 E Ocean Blvd Suite 205</a><br><a
href=3D"https://www.google.com/maps/se=
arch/555+E+Ocean+Blvd+Suite+205+Long+Beach,+CA+90802?
entry=3Dqmail&sour=
ce=3Dg" style=3D"font-family:arial,sans-serif">Long Beach, CA
90802</a></fo=
nt></strong></font></div><div><font face=3D"arial, sans-serif"
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t-family:arial,sans-serif;color:rgb(80,0,80)"><b style=3D"font-
family:arial=
,sans-serif"><a href=3D"tel:8882459393" target=3D"_blank"
style=3D"font-fam=
ily:arial,sans-serif">(888)245-9393</a></b></font></div><div><font
face=3D"=
arial, sans-serif" style=3D"font-family:arial,sans-
serif;color:rqb(80,0,80)=
"><b style=3D"font-family:arial,sans-serif"><a
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eople.org/" target=3D"_blank" style=3D"font-family:arial,sans-
serif"><font =
style=3D"font-family:arial,sans-
serif; color: rgb(66,133,244) ">www.unitethepe=
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t, Helvetica, Arial, sans-serif"></div></div></div><div
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### Transcription

Excerpt from Pete\_0001167

'Not Like Us' Easter Eggs | Keith Lee Effect Worn Off? | 'Megan' 30 Million Filtered Streams!

(7/5/2024)

### Milagro Elizabeth Cooper:

Everybody just has to do their job. So shout out to Unite the People - and let me actually pull up Unite the People's page because when anything happens with him, this is who you're gonna hear from - and then um obviously I'm in contact with them so you know I can get information from them and - and try to just get clarity on different things so that I can present that to you.



```
1
2
 3
 4
 5
 6
 7
 8
 9
10
11
12
     Daystar Peterson & Ceasar McDowell Call
13
     October 30, 2024
14
     23:19:43 429378-545858981-10302024-231849-
15
     DCP 007-367-5623550834-2003
16
17
18
19
20
21
22
23
24
25
                                                Page 1
```

```
1
               AUTOMATED VOICE: Press one for -- two
 2
     -- please enter your eight-digit key.
 3
     (Indiscernible) number at the tone. Please enter
 4
     your four-digit private code after the beep.
 5
     This call will be recorded and monitored. Thank
 6
     you for using Global Tel Link. Your call is
 7
     being processed.
8
             DAYSTAR PETERSON:
                                  Hello.
9
               AUTOMATED VOICE: This is Global Tel
10
     Link. You have a prepaid call from Tory, an
11
     incarcerated individual at the California
12
     Correctional Institution, Tehachapi, California.
13
     This call and your telephone number will be
     monitored and recorded. You have a prepaid call.
14
15
     You will not be charged for this call. To accept
16
     this call, say or dial five now.
17
               DAYSTAR PETERSON: Hello? Hello?
18
              CEASAR MCDOWELL: Yeah.
19
               DAYSTAR PETERSON: Yes.
20
               CEASAR MCDOWELL: Well, yeah, but
21
     anyway, I know (indiscernible) but just -- you've
22
     got to remember --
23
               DAYSTAR PETERSON: (Indiscernible)
24
     shit, bro. This is like, for some
25
     (indiscernible). Nah, bro. That ain't it.
                                               Page 2
```

Veritext Legal Solutions Calendar-CA@veritext.com 866-299-5127

```
1
                CEASAR MCDOWELL: Yeah, some homeless
  2
      niggas that are on medication. These niggas over
  3
      there. Well, these niggas are over there,
      (indiscernible), yeah, these niggas need to
  4
  5
      change that.
  6
                DAYSTAR PETERSON: Yeah, for sure.
  7
                CEASAR MCDOWELL: Can you dig? But, on
 8
      that one thing that we talked about. We really
  9
      need to call -- did you send us -- you haven't
 10
      sent us the paperwork because you changed
 11
      buildings. But you need to send us that
 12
      paperwork, nigger, so we can get ahead of that.
 13
                DAYSTAR PETERSON: Which paperwork?
 14
      Oh. Is there any way that we can send somebody
 15
      up there to get it? I know it's kind of far,
      but, yeah, (indiscernible) something in my mail,
 16
 17
      bro. I just know it, bro. It's not going to get
 18
      to you, dog. And it's not even just that.
 19
                What I was going to tell you is, all
 20
      three of those write-ups, all three of those
 21
      write-ups -- oh, it's good that you're on the
22
      phone. All three of those write-ups are their
23
      final decision at Sacramento.
                So, at this point, like I -- if you
24
25
      want -- niggas want to try to go -- I mean, just
                                                Page 3
```

```
1
      because we're already going at it, niggas want to
  2
      try to go for fucking all three write-ups, nigga,
  3
      I -- it's -- I'll be -- I'll double it. You feel
  4
      me? Like, whatever I was saying before, I'll
  5
      just double it.
                CEASAR MCDOWELL: Well, I'm not trying
  6
  7
      to charge you for all of that, bro.
  8
                DAYSTAR PETERSON: I know, but it's the
  9
      amount of work that it may take. You know what
 10
      I'm saying?
11
               CEASAR MCDOWELL:
                                  Yeah, I know. I get
12
      that.
13
               DAYSTAR PETERSON: I (indiscernible)
 14
      have to actually go up to court, and drive up
 15
      here and all this other extra shit. It's just
 16
      like, I don't know if that's how it works, but
 17
      I'm just saying. Or maybe it's just that --
18
                CEASAR MCDOWELL: You know, the write-
 19
      ups, everything that we're going to have to drive
20
      up there on and take to Louisville, we already
21
      had a meeting on it today, right? And the first
22
      thing we're going to do is, I'm going to take my
23
      (indiscernible) the squad. So, we're going to
24
      attack all of these write-ups. We'll attack them
25
      all for you. But we was focused on that one,
                                                Page 4
```

```
1
     right?
2
               DAYSTAR PETERSON: Yeah.
3
             CEASAR MCDOWELL: And then, get the --
4
    because ain't no lawyer's going to know what
5
     these niggas know. Right?
 6
               DAYSTAR PETERSON: Yeah.
7
              CEASAR MCDOWELL: So then, we going to
8
    get the whole plan mapped out. Then, we going to
9
    call the lawyer in. Okay, listen, this is what
10
     we doing. We're going to talk to you first,
11
    bleh, bleh, bleh, bleh. We'll call the
     lawyer in. Okay, this is the plan. This is what
12
13
    we going to do.
14
              And we going to need the motherfuckers
15
    to drive up to the DA's Office, all of that shit,
16
     and make the motherfucker -- we'll do all that
17
     shit. You dig? And then --
18
               DAYSTAR PETERSON: Mm hmm.
19
              CEASAR MCDOWELL: -- if you want to --
20
     I don't want you to double it because I just --
21
     I'm not -- I hate how niggas nickel and dime you,
22
     and I'm never trying to be one of them niggas.
23
               DAYSTAR PETERSON: Yeah, I only do it
     because I know that -- I know -- the reason why I
24
25
     pay for shit like that is because I just know
                                               Page 5
```

1 that like, I know that niggas need -- I know 2 you're trying to be your (indiscernible) company, 3 bro. But it's not about you all the time. I 4 know that sometimes you got to use it for your 5 own well-being, too, at the end of the day, bro. 6 This is not about you, bro. It's about 7 the company. Like, that's why I start these 8 things. It's not -- like, even with your hand to 9 God, (indiscernible), it's not so much -- more so 10 about, you know, just the fact that niggas was just like, all right, you know, we can get these 11 12 niggas in, and that's kind of tight, that we're 13 doing something for prisoners. 14 It's not that. It's just like, it's 15 the fact that like, yo, we are doing something 16 that is revolutionary, and this company is the 17 first company to ever do it. And it's just like, the story's just so crazy, like, imagine we shoot 18 19 a movie on your life, nigga. And it's just like, 20 from (indiscernible) this and knowing me, to this 21 (indiscernible) David and Goliath and we're 22 pulling at Goliath, nigga. 23 And it's just like, we're all just coming with it. Like, you know what I'm saying? 24 25 Like, it's like, I'm getting the information Page 6

```
sometimes and I'm feeding it to you. And then
1
 2
     you're running quarterback with the fucking --
 3
     with the law shit that you've been doing.
               And you've got the (indiscernible) in
 4
 5
     the media when you need to do the media. It's
     just like, you know what I'm saying, this shit is
 6
 7
     factual, of course. And just getting it out
8
     there. Getting our relationships and getting
9
     people to -- that awareness for it, right?
10
     it's just like, yo bro, like, it's just --
11
               AUTOMATED VOICE: This call and your
12
     telephone number will be monitored and recorded.
13
               DAYSTAR PETERSON: (Indiscernible)
14
     really be (indiscernible) --
15
               CEASAR MCDOWELL: Yeah, can you hear
16
    me?
17
               DAYSTAR PETERSON: Yeah.
18
               CEASAR MCDOWELL: Let me read you -- we
19
     finished the statement for the media tomorrow.
20
               DAYSTAR PETERSON: I (indiscernible) --
21
               CEASAR MCDOWELL:
                                 I'm wondering --
22
               DAYSTAR PETERSON: Let me hear it.
23
               CEASAR MCDOWELL: Let me read it to
24
     you. So, it says, Unite the People, Inc. agrees
25
     to represent -- this is the media release for
                                               Page 7
```

1 tomorrow. Unite the People, Inc. agrees to 2 represent Milagro Cooper against threats and 3 intimidation targeting influencers for expressing their opinions in the civil matter filed by the 4 5 now Claimant Megan Pete. Right? 6 It says - that's in the headline, 7 (indiscernible). There is a recent filing for 8 Megan Pete, an individual Plaintiff, whose name is Milagro Elizabeth Cooper, an individual as a 9 10 Defendant. 11 Unite the People, Inc. is a nonprofit 12 law firm that promotes social justice throughout 1.3 the United States as well as provide affordable 14 legal services to the underserved community, as 15 well as multiple other services, i.e. mentoring 16 programs for the disadvantaged youth, empowering 17 young women, mentoring programs, assisting the homeless, veterans, transitional housing, etc., 18 19 right? 20 It just tells a little bit about the 21 company, right? And then it says, Milagro 22 Elizabeth Cooper has been served a lawsuit making 23 a lot of false claims against her professional 24 conduct in an attempt to stop her from reporting 25 on Daystar Peterson, aka Tory Lanez's case, Page 8

1 because in their lawsuit, that's all they talk 2 about is your case and what Milagro says on your 3 behalf, right? 4 DAYSTAR PETERSON: Yeah. 5 CEASAR MCDOWELL: They said that -- all 6 kinds of shit, right? But I'm going to run 7 through this real quick. Unite the People, Inc. 8 was founded and exists to fight on behalf of the 9 disadvantaged, the small and the powerless, 10 against these Goliath organizations, corporations 11 or celebrities that want to push around and bully 12 the Davids of the world, i.e., the people. 13 Unite the People, Inc. will not stand by and let an intractable justice system or a 14 billion-dollar corporation led by popular 15 16 celebrities take advantage of the small guy in an 17 attempt to silence someone from their First 18 Amendment right of freedom of speech. 19 Unite the People, Inc. has agreed to 20 take on the defense of Milagro Cooper, as well as 21 any other social media influencer, journalism 22 platform, journalist, podcast or reporter of any 23 type that has received this lawsuit against them 24 or any other form of bullying/harassment to 25 silence them from their right of freedom of Page 9

1 speech. 2 Any such influencer, media person or 3 organization who has been or received a threat, 4 an attempt to silence them from the same 5 organization or corporation should contact Unite 6 the People, Inc. immediately. 7 DAYSTAR PETERSON: So, is this a 8 statement or is this a -- because it sounds like 9 two things are going on. It sounds like you're saying like -- it sounds like you're saying, yo, 10 11 we're representing Milagro, these are the things, 12 these are the facts, this is the basis. 13 then, you're saying, but if anybody else needs 14 it, like, what is it? Is this a -- like, what is 15 this? (Indiscernible) --16 CEASAR MCDOWELL: So, what 17 (indiscernible) -- it's a statement, right? What 18 they're doing is -- we're putting out a statement 19 saying that we're representing Milagro. It's a 20 two-pronged thing. We're putting out a statement 21 saying that we're representing Milagro. But 22 then, we're also stating that anybody else can --23 because you know they're targeting more people 24 than just her. It was quite a few people that 25 they're targeting, right? Page 10

```
1
               DAYSTAR PETERSON: Yeah --
 2
              CEASAR MCDOWELL: And so, we're putting
 3
     out a statement saying any of the rest of you
 4
     guys that are being targeted by this, if you need
 5
     assistance, contact us as well.
 6
               DAYSTAR PETERSON: Yeah, for sure. For
7
     sure.
8
             CEASAR MCDOWELL: Do you get what I'm
9
     saying?
10
                                  Yeah, I get it. I
               DAYSTAR PETERSON:
11
     get it. I get it. So, what time are you guys
12
     going to post the (indiscernible) up?
13
               CEASAR MCDOWELL: Probably first thing
     in the morning. (indiscernible) told me to post
14
15
     it to my Instagram first, to the Unite the People
     Instagram. And she said, post it early and then
16
17
     she'll send it over to TMZ. And I guess whoever
     else. There's a bunch of people -- Rolling Stone
18
19
20
             DAYSTAR PETERSON: (indiscernible) --
21
               CEASAR MCDOWELL: What's that?
22
               DAYSTAR PETERSON:
                                  (indiscernible) was
23
    telling me like, yeah, I don't know if we should
24
     put the Milagro part in because --
25
               AUTOMATED VOICE: This call and your
                                              Page 11
```

```
1
      telephone number will be monitored and recorded.
  2
                DAYSTAR PETERSON: If he should say
  3
      that out publicly, (indiscernible). He should
  4
      say that out publicly because at the end of the
  5
      day, he, like -- because she's saying I'm a part
  6
      of the Board of Advisory, so isn't that a
  7
      conflict of interest?
  8
                CEASAR MCDOWELL: No. You're not --
      you're not -- you're not -- this is a thing where
 9
 10
 11
                DAYSTAR PETERSON: (Indiscernible) --
 12
               CEASAR MCDOWELL: -- Megan is suing
 13
      Milagro, right?
 14
                DAYSTAR PETERSON: Yeah.
 15
                CEASAR MCDOWELL: That don't have --
 16
      you're done with Megan. It's Daystar Peterson
 17
      against the Attorney General's Office and the
18
      Appellate Courts. That's why we said, why the
 19
      fuck was her lawyer even speaking up. She has
 20
      nothing to do with this no more. Do you dig what
 21
      I'm saying?
 22
                DAYSTAR PETERSON: Yeah.
 23
                CEASAR MCDOWELL: The only conflict of
 24
      interest would be if Milagro didn't know we had
 25
      represented you. You dig what I'm saying? But -
                                                Page 12
```

```
1
 2
               DAYSTAR PETERSON:
                                 Okay.
 3
               CEASAR MCDOWELL: -- it don't have
 4
     nothing to do with you no more. What
 5
     (indiscernible) was saying was -- and you know, I
 6
     love (indiscernible), but she will hesitate on a
     lot of this shit. Right? Not even talking about
7
8
     this shit.
9
               DAYSTAR PETERSON: (Indiscernible) --
10
               CEASAR MCDOWELL: -- this shit, like
11
     she was like, yo, I think we should wait before
12
     we do this and et cetera. Hello? Tory? Damn,
13
     that shit cut off like exactly at 11:30. Hello?
14
     Hello?
15
16
17
18
19
20
21
22
23
24
25
                                               Page 13
```

```
1
                  CERTIFICATION
2
3
    I, Sonya Ledanski Hyde, certify that the
    foregoing transcript is a true and accurate
4
5
    record of the proceedings.
6
7
8
     Songa M. Sudanski Hyde
9
10
11
    Veritext Legal Solutions
12
    330 Old Country Road
13
    Suite 300
14
    Mineola, NY 11501
15
16
    Date: January 7, 2025
17
18
19
20
21
22
23
24
25
                                            Page 14
```

## [& - daystar]

&	ahead 3:12	<b>bunch</b> 11:18	company 6:2,7		
<b>&amp;</b> 1:12	ain't 2:25 5:4	c	6:16,17 8:21		
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## [daystar - key]

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## [kind - post]

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## [thing - youth]

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### **Transcription**

Excerpt from Pete\_0001167

'Not Like Us' Easter Eggs | Keith Lee Effect Worn Off? | 'Megan' 30 Million Filtered Streams!

(7/5/2024)

### Milagro Elizabeth Cooper:

Everybody just has to do their job. So shout out to Unite the People - and let me actually pull up Unite the People's page because when anything happens with him, this is who you're gonna hear from - and then um obviously I'm in contact with them so you know I can get information from them and - and try to just get clarity on different things so that I can present that to you.

So let me like this post from this page. So this is the actual form that was filed on July 2nd and you can see that it says 745 motion granted for Mr. Peterson and so it says the court has read and considered petitioner Daystar Peterson's June 21st 2024 motion for Relevant evidence brought pursuant to penal code section 745 subdivision D.

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**Date/Time:(Generated)** 12/17/2024 7:42:22 AM



	Search Criteria
From(Start Date/Time):	10/9/2023 12:00:00 AM
To (End Date/Time):	12/17/2024 11:59:00 PM
User ID:	gsalinas
Duration:	From: 0 To: 0
Facility:	All
Living Unit:	
Stations:	
Completion Codes:	Completed Call
Tracking #:	
Recorded:	All
Monitored:	All
Transaction Type:	All
3 Way Call:	All
Rate Type:	All
Alerted:	All
Alert Group:	
Accessed:	All
Protected:	All
Telephone Type:	All
Exported:	All
Destination Number	
Inmate:	bw0168
Workstation ID:	HOUCADOCIIS1

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## ITS Media Export

Date/Time:(Generated) 12/17/2024 7:42:22 AM

Report Site: Dept of Corr HQ 2 of 8

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2	CCI	MAIN	10/24/2023 09:55:42	BW0168	PETERSON, DAYSTAR		15	429378-430834863-10242023-095- 2003.	
3	CCI	MAIN	10/24/2023 10:11:38	BW0168	PETERSON, DAYSTAR		1	429378-430838629-10242023-101 2003.	
4	CCI	MAIN	10/24/2023 10:13:23	BW0168	PETERSON, DAYSTAR		10	429378-430839127-10242023-101 2003.	
5	CCI	MAIN	10/31/2023 18:41:14	BW0168	PETERSON, DAYSTAR		3	429378-433351421-10312023-184 2003.	
6	CCI	MAIN	10/31/2023 18:45:49	BW0168	PETERSON, DAYSTAR		15	429378-433353809-10312023-184 2003.	
7	CCI	MAIN	11/01/2023 14:26:52	BW0168	PETERSON, DAYSTAR		9	429378-433565147-11012023-142 2003.	
8	CCI	MAIN	11/14/2023 13:10:56	BW0168	PETERSON, DAYSTAR		13	429378-437697541-11142023-131 2003.	
9	CCI	MAIN	11/14/2023 15:03:25	BW0168	PETERSON, DAYSTAR		1	429378-437730137-11142023-150 2003.	
10	CCI	MAIN	11/15/2023 10:24:22	BW0168	PETERSON, DAYSTAR		15	429378-437957171-11152023-102 2003.	
11	CCI	MAIN	11/15/2023 10:40:40	BW0168	PETERSON, DAYSTAR		3	429378-437961219-11152023-103 2003.	
12	CCI	MAIN	11/15/2023 10:47:41	BW0168	PETERSON, DAYSTAR		6	429378-437962931-11152023-104 2003.	
13	CCI	MAIN	11/15/2023 10:54:31	BW0168	PETERSON, DAYSTAR		15	429378-437964607-11152023-105. 2003.	
14	CCI	MAIN	11/15/2023 11:09:57	BW0168	PETERSON, DAYSTAR		15	429378-437968341-11152023-110 2003.	
15	CCI	MAIN	11/15/2023 11:26:38	BW0168	PETERSON, DAYSTAR		4	429378-437971921-11152023-112 2003.	B ( Table ) 이 10 전 ( 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
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Report Site: Dept of Corr HQ 3 of 8

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20	CCI	MAIN	12/17/2023 08:58:22	BW0168	PETERSON, DAYSTAR		5	429378-448173365-12172023-085737-DCP_007-023-5623550834- 2003.V24
21	CCI	MAIN	12/22/2023 11:15:42	BW0168	PETERSON, DAYSTAR		5	429378-449808439-12222023-111447-DCP_007-219-5623550834- 2003.V24
22	CCI	MAIN	12/31/2023 16:46:21	BW0168	PETERSON, DAYSTAR		12	429378-452974905-12312023-164521-DCP_016-136-5623550834- 2003.V24
23	CCI	MAIN	03/01/2024 15:18:12	BW0168	PETERSON, DAYSTAR		14	429378-472399269-03012024-151721-DCP_009-214-5623550834- 2003.V24
24	CCI	MAIN	03/11/2024 14:46:07	BW0168	PETERSON, DAYSTAR		15	429378-475641583-03112024-144514-DCP_008-225-5623550834- 2003.V24
25	CCI	MAIN	03/11/2024 15:03:04	BW0168	PETERSON, DAYSTAR		7	429378-475647003-03112024-150203-DCP_009-124-5623550834- 2003.V24
26	CCI	MAIN	03/11/2024 15:11:10	BW0168	PETERSON, DAYSTAR		15	429378-475649893-03112024-151018-DCP_018-224-5623550834- 2003.V24
27	CCI	MAIN	03/14/2024 13:48:10	BW0168	PETERSON, DAYSTAR		7	429378-476527683-03142024-134651-DCP_025-311-5623550834- 2003.V24
28	CCI	MAIN	03/14/2024 13:55:52	BW0168	PETERSON, DAYSTAR		15	429378-476529719-03142024-135449-DCP_018-285-5623550834- 2003.V24
29	CCI	MAIN	03/14/2024 14:12:14	BW0168	PETERSON, DAYSTAR		7	429378-476534307-03142024-141123-DCP_016-150-5623550834- 2003.V24
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	User ID: g	salinas						Workstation ID: HOUCADOCIIS1

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31	CCI	MAIN	07/28/2024 15:42:12	BW0168	PETERSON, DAYSTAR		15	429378-517908849-07282024-154 2003.		7-5623550834-
32	CCI	MAIN	08/23/2024 21:12:40	BW0168	PETERSON, DAYSTAR		15	429378-525518809-08232024-211 2003.		9-5623550834-
33	CCI	MAIN	08/23/2024 21:46:29	BW0168	PETERSON, DAYSTAR		15	429378-525533061-08232024-214 2003.		0-5623550834-
34	CCI	MAIN	08/23/2024 22:02:57	BW0168	PETERSON, DAYSTAR		15	429378-525539121-08232024-220 2003.		5-5623550834-
35	CCI	MAIN	08/29/2024 18:01:18	BW0168	PETERSON, DAYSTAR		3	429378-527270155-08292024-180 2003.		8-5623550834-
36	CCI	MAIN	09/10/2024 22:23:20	BW0168	PETERSON, DAYSTAR		15	429378-531026821-09102024-222 2003.		4-5623550834-
37	CCI	MAIN	09/10/2024 22:39:49	BW0168	PETERSON, DAYSTAR		5	429378-531031725-09102024-223 2003.		7-5623550834-
38	CCI	MAIN	09/12/2024 14:27:27	BW0168	PETERSON, DAYSTAR		3	429378-531417541-09122024-142 2003.		5-5623550834-
39	CCI	MAIN	09/25/2024 20:24:29	BW0168	PETERSON, DAYSTAR		15	429378-535250065-09252024-202 2003.		8-5623550834-
40	CCI	MAIN	09/25/2024 20:41:25	BW0168	PETERSON, DAYSTAR		15	429378-535257487-09252024-204 2003.		3-5623550834-
41	CCI	MAIN	09/30/2024 19:57:41	BW0168	PETERSON, DAYSTAR		14	429378-536792435-09302024-195 2003.	The state of the s	1-5623550834-
42	CCI	MAIN	10/02/2024 13:10:26	BW0168	PETERSON, DAYSTAR		1	429378-537240147-10022024-130 2003.		2-5623550834-
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44	CCI	MAIN	10/03/2024 12:05:08	BW0168	PETERSON, DAYSTAR		9	429378-537515841-10032024-120 2003.		9-5623550834-
45	CCI	MAIN	10/10/2024 21:59:01	BW0168	PETERSON, DAYSTAR		15	429378-539814315-10102024-215 2003.		9-5623550834-
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Report Site: Dept of Corr HQ 5 of 8

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49	CCI	MAIN	10/10/2024 23:03:55	BW0168	PETERSON, DAYSTAR		15	429378-539831639-10102024-230307-DCP_008-287-5623550834- 2003.V24
50	CCI	MAIN	10/13/2024 20:49:03	BW0168	PETERSON, DAYSTAR		15	429378-540729237-10132024-204802-DCP_018-135-5623550834- 2003.V24
51	CCI	MAIN	10/29/2024 10:47:41	BW0168	PETERSON, DAYSTAR		5	429378-545320533-10292024-104649-DCP_009-353-5623550834- 2003.V24
52	CCI	MAIN	10/29/2024 10:55:43	BW0168	PETERSON, DAYSTAR		15	429378-545322389-10292024-105455-DCP_009-346-5623550834- 2003.V24
53	CCI	MAIN	10/29/2024 11:11:19	BW0168	PETERSON, DAYSTAR		15	429378-545326245-10292024-111030-DCP_025-161-5623550834- 2003.V24
54	CCI	MAIN	10/29/2024 11:27:23	BW0168	PETERSON, DAYSTAR		5	429378-545330405-10292024-112635-DCP_007-028-5623550834- 2003.V24
55	CCI	MAIN	10/30/2024 23:03:38	BW0168	PETERSON, DAYSTAR		15	429378-545858451-10302024-230252-DCP_007-318-5623550834- 2003.V24
56	CCI	MAIN	10/30/2024 23:19:43	BW0168	PETERSON, DAYSTAR		12	429378-545858981-10302024-231849-DCP_007-367-5623550834- 2003.V24
57	CCI	MAIN	11/01/2024 09:19:46	BW0168	PETERSON, DAYSTAR		4	429378-546193575-11012024-091857-DCP_025-327-5623550834- 2003.V24
58	CCI	MAIN	11/01/2024 09:24:57	BW0168	PETERSON, DAYSTAR		15	429378-546194605-11012024-092357-DCP_018-226-5623550834- 2003.V24
59	CCI	MAIN	11/01/2024 09:42:35	BW0168	PETERSON, DAYSTAR		15	429378-546198331-11012024-094144-DCP_025-025-5623550834- 2003.V24
60	CCI	MAIN	11/01/2024 23:12:30	BW0168	PETERSON, DAYSTAR		15	429378-546481079-11012024-231138-DCP_018-057-5623550834- 2003.V24

User ID: gsalinas Workstation ID: HOUCADOCIIS1

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**Report Site:** Dept of Corr HQ 6 of 8

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62	CCI	MAIN	11/02/2024 22:35:19	BW0168	PETERSON, DAYSTAR		15	429378-546803135-11022024-223424-DCP_025-322-5623550834- 2003.V24
63	CCI	MAIN	11/02/2024 22:51:02	BW0168	PETERSON, DAYSTAR		10	429378-546807573-11022024-225009-DCP_007-210-5623550834- 2003.V24
64	CCI	MAIN	11/02/2024 23:01:57	BW0168	PETERSON, DAYSTAR		15	429378-546809917-11022024-230104-DCP_008-193-5623550834- 2003.V24
65	CCI	MAIN	11/07/2024 10:08:45	BW0168	PETERSON, DAYSTAR		15	429378-548005961-11072024-100749-DCP_016-098-5623550834- 2003.V24
66	CCI	MAIN	11/07/2024 15:12:48	BW0168	PETERSON, DAYSTAR		15	429378-548091543-11072024-151147-DCP_008-076-5623550834- 2003.V24
67	CCI	MAIN	11/07/2024 15:30:02	BW0168	PETERSON, DAYSTAR		15	429378-548098139-11072024-152918-DCP_018-163-5623550834- 2003.V24
68	CCI	MAIN	11/07/2024 16:01:52	BW0168	PETERSON, DAYSTAR		15	429378-548109891-11072024-160058-DCP_018-194-5623550834- 2003.V24
69	CCI	MAIN	11/07/2024 16:19:13	BW0168	PETERSON, DAYSTAR		13	429378-548116385-11072024-161817-DCP_009-372-5623550834- 2003.V24
70	CCI	MAIN	11/08/2024 21:43:11	BW0168	PETERSON, DAYSTAR		15	429378-548567345-11082024-214219-DCP_009-216-5623550834- 2003.V24
71	CCI	MAIN	11/09/2024 15:55:29	BW0168	PETERSON, DAYSTAR		3	429378-548748747-11092024-155440-DCP_016-269-5623550834- 2003.V24
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73	CCI	MAIN	11/15/2024 16:18:35	BW0168	PETERSON, DAYSTAR		12	429378-550586505-11152024-161747-DCP_016-082-5623550834- 2003.V24
74	CCI	MAIN	11/15/2024 19:12:26	BW0168	PETERSON, DAYSTAR		15	429378-550656891-11152024-191131-DCP_007-225-5623550834- 2003.V24
75	CCI	MAIN	11/15/2024 19:28:41	BW0168	PETERSON, DAYSTAR		15	429378-550665429-11152024-192743-DCP_016-270-5623550834- 2003.V24

User ID: gsalinas HOUCADOCIIS1

**Date/Time:** 12/17/2024 7:42:22 AM

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**Report Site:** Dept of Corr HQ 8

#	Site Code	<b>Living Unit</b>	Date Time	Inmate ID	Inmate Name	Destination	Duration	File Name
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77	CCI	MAIN	11/17/2024 20:50:45	BW0168	PETERSON, DAYSTAR		10	429378-551362471-11172024-204948-DCP_007-068-5623550834- 2003.V24
78	CCI	MAIN	11/19/2024 21:17:38	BW0168	PETERSON, DAYSTAR		15	429378-551965905-11192024-211622-DCP_009-238-5623550834- 2003.V24
79	CCI	MAIN	11/19/2024 21:34:39	BW0168	PETERSON, DAYSTAR		15	429378-551972667-11192024-213350-DCP_018-281-5623550834- 2003.V24
80	CCI	MAIN	11/19/2024 21:51:13	BW0168	PETERSON, DAYSTAR		15	429378-551978259-11192024-215012-DCP_009-154-5623550834- 2003.V24
81	CCI	MAIN	11/19/2024 22:07:42	BW0168	PETERSON, DAYSTAR		15	429378-551983357-11192024-220639-DCP_018-241-5623550834- 2003.V24
82	CCI	MAIN	11/19/2024 22:23:26	BW0168	PETERSON, DAYSTAR		15	429378-551987913-11192024-222226-DCP_009-228-5623550834- 2003.V24
83	CCI	MAIN	11/19/2024 22:39:41	BW0168	PETERSON, DAYSTAR		15	429378-551992223-11192024-223849-DCP_018-016-5623550834- 2003.V24
84	CCI	MAIN	11/20/2024 13:46:29	BW0168	PETERSON, DAYSTAR		2	429378-552089481-11202024-134539-DCP_007-211-5623550834- 2003.V24
85	CCI	MAIN	11/20/2024 15:14:02	BW0168	PETERSON, DAYSTAR		15	429378-552114691-11202024-151303-DCP_008-250-5623550834- 2003.V24
86	CCI	MAIN	11/20/2024 15:30:07	BW0168	PETERSON, DAYSTAR		8	429378-552120241-11202024-152918-DCP_018-011-5623550834- 2003.V24
87	CCI	MAIN	11/20/2024 18:24:13	BW0168	PETERSON, DAYSTAR		15	429378-552178437-11202024-182312-DCP_016-255-5623550834- 2003.V24
88	CCI	MAIN	11/20/2024 18:41:13	BW0168	PETERSON, DAYSTAR		15	429378-552186815-11202024-184011-DCP_009-006-5623550834- 2003.V24
89	CCI	MAIN	11/21/2024 10:44:28	BW0168	PETERSON, DAYSTAR		15	429378-552336401-11212024-104327-DCP_016-027-5623550834- 2003.V24
90	CCI	MAIN	11/21/2024 11:02:07	BW0168	PETERSON, DAYSTAR		15	429378-552340261-11212024-110108-DCP_009-343-5623550834- 2003.V24

User ID: gsalinas Workstation ID: HOUCADOCIIS1

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Report Site: Dept of Corr HQ 8 of 8

#	Site Code	Living Unit	Date Time	Inmate ID	Inmate Name	Destination	Duration	File Name
91	CCI	MAIN	11/22/2024 19:28:52	BW0168	PETERSON, DAYSTAR		2	429378-552804169-11222024-192744-DCP_016-218-5623550834- 2003.V24
92	CCI	MAIN	11/22/2024 19:33:43	BW0168	PETERSON, DAYSTAR		11	429378-552806759-11222024-193253-DCP_016-098-5623550834- 2003.V24
93	CCI	MAIN	11/26/2024 09:58:23	BW0168	PETERSON, DAYSTAR		15	429378-553885107-11262024-095726-DCP_016-129-5623550834- 2003.V24
94	CCI	MAIN	11/26/2024 10:15:40	BW0168	PETERSON, DAYSTAR		15	429378-553889119-11262024-101451-DCP_008-097-5623550834- 2003.V24
95	CCI	MAIN	12/04/2024 09:06:47	BW0168	PETERSON, DAYSTAR		15	429378-556519759-12042024-090551-DCP_016-207-5623550834- 2003.V24
96	CCI	MAIN	12/04/2024 09:22:54	BW0168	PETERSON, DAYSTAR		15	429378-556522639-12042024-092208-DCP_016-296-5623550834- 2003.V24
97	CCI	MAIN	12/05/2024 19:08:50	BW0168	PETERSON, DAYSTAR		2	429378-556994737-12052024-190746-DCP_008-377-5623550834- 2003.V24

Total Records: 97

User ID: gsalinas HOUCADOCIIS1

**Date/Time:** 12/17/2024 7:42:22 AM 8 of 8

4205016.001 03/23/2025

Run Date:

7

10

11

12

13

14

10/31/24

10/31/24

10/31/24

11/01/24

11/01/24

11/01/24

11/02/24

11/07/24

03/23/2025

 $\frac{509}{\text{AT&T has queried for records from }10/08/2020\ 12:00:00am\ \text{to }03/17/2025\ 11:59:59pm}$ AT&T has queried for records using Eastern Time Zone. AT&T's records are stored and provided in

> C. MCDOWELL 07.25.25

Run Time: Voice Usage For:			9:17:33 281)640-453	6, (562)35	(562) 355-0834					
Item	Conn. Date	Conn. Time (UTC)	Seizure Time	ET	Originating Number	Terminating Number	IMBI	IMSI	CT	Feature
1	10/31/24	00:31:36	0:04	13:27			35168257631221 APPLE IPHONE15	310280113409542	MT	[Wi-Fi:NIOP]
2	10/31/24	02:19:06	0:01	0:02			35168257631221 APPLE IPHONE15	310280113409542	MT	[NIOP]
3	10/31/24	02:19:11	0:01	0:03			35168257631221 APPLE IPHONE15	310280113409542	MT	[NIOP]
4	10/31/24	13:58:59	0:01	0:02			35168257631221 APPLE IPHONE15	310280113409542	MT	[Wi-Fi:NIOP]
5	10/31/24	13:59:04	0:01	0:04			35168257631221 APPLE IPHONE15	310280113409542	MT	[Wi-Fi:NIOP]
6	10/31/24	14:51:58	0:10	8:11			35168257631221	310280113409542	MO	[Wi-Fi]

			TPHONETS			
58:59	0:01	0:02	35168257631221 APPLE IPHONE15	310280113409542	MT	[Wi-Fi:NIOP]
9:04	0:01	0:04	35168257631221 APPLE IPHONE15	310280113409542	MT	[Wi-Fi:NIOP]
:58	0:10	8:11	35168257631221 APPLE IPHONE15	310280113409542	MO	[Wi-Fi]
59	0:04	4:19	35168257631221 APPLE IPHONE15	310280113409542	MT	[NIOP]
	0:02	0:04	35168257631221 APPLE IPHONE15	310280113409542	MO	[]
	0:15	0:58	35168257631221 APPLE IPHONE15	310280113409542	MO	[]
0	:10	0:25	35168257631221 APPLE IPHONE15	310280113409542	MT	[Wi-Fi:NIOP]
0	:12	1:41	35168257631221 APPLE IPHONE15	310280113409542	MT	[Wi-Fi:NIOP]
(	0:03	21:46	35168257631221 APPLE IPHONE15	310280113409542	MT	[Wi-Fi:NIOP:CMW]
	0:05	1:36	35168257631221 APPLE IPHONE15	310280113409542	MT	[Wi-Fi:NIOP]
	0:01	0:02	35168257631221 APPLE IPHONE15	310280113409542	MT	[NIOP]

### Case 1:24-cv-24228-CMA Document 12040BITLETEN on FLSD Docket 08/14/2025 Page 390 of

4205016.001 03/23/2025

 $\frac{509}{\text{AT&T has queried for records from }10/08/2020\ 12:00:00\text{am to }03/17/2025\ 11:59:59\text{pm}}$ AT&T has queried for records using Eastern Time Zone. AT&T's records are stored and provided in

03/23/2025 Run Date: Run Time: 09:17:33

(281)640-4536, (562)355-0834 Voice Usage For:

Item	Conn. Date	Conn. Time (UTC)	Seizure Time	ET	Originating Number	Terminating Number	IMEI	IMSI	CT	I
L5	11/07/24	19:20:05	0:02	0:02			35168257631221 APPLE IPHONE15	310280113409542	МТ	I
L6	11/07/24	19:20:18	0:02	0:02			35168257631221 APPLE IPHONE15	310280113409542	МТ	[
7	11/07/24	19:31:06	0:18	0:01			35168257631221 APPLE IPHONE15	310280113409542	MO	7]
3	11/07/24	19:31:14	0:05	0:00			35168257631221 APPLE IPHONE15	310280113409542	MO	[7
9	11/07/24	22:29:55	0:15	0:36			35168257631221 APPLE IPHONE15	310280113409542	MO	
0	11/07/24	22:30:31	0:00	1:27			35168257631221 APPLE IPHONE15	310280113409542	MO	[7
L	11/08/24	21:12:52	0:07	1:42			35168257631221 APPLE IPHONE15	310280113409542	MO	
2	11/12/24	19:17:29	0:00	0:02			35168257631221 APPLE IPHONE15	310280113409542	МТ	[Wi-
3	11/12/24	19:17:33	0:00	0:02			35168257631221 APPLE IPHONE15	310280113409542	МТ	[Wi-
•	11/18/24	19:43:49	0:01	0:20			35168257631221 APPLE IPHONE15	310280113409542	MT	[Wi-
5	11/18/24	19:44:37	0:13	0:02			35168257631221 APPLE IPHONE15	310280113409542	MO	
5	11/18/24	19:44:48	0:08	0:00			35168257631221 APPLE IPHONE15	310280113409542	MO	
7	11/18/24	19:45:23	0:02	0:03			35168257631221 APPLE IPHONE15	310280113409542	MO	
8	11/18/24	19:45:54	0:03	1:38			35168257631221 APPLE IPHONE15	310280113409542	МТ	[

### Case 1:24-cv-24228-CMA Document 120 MOBILITY on FLSD Docket 08/14/2025 Page 391 of

4205016.001 03/23/2025  $\frac{509}{\text{AT&T}} \text{ has queried for records from } \frac{10/08/2020}{12:00:00\text{am to } 03/17/2025} \text{ } 11:59:59\text{pm}$   $\frac{11.59}{100} \text{ AT&T} \text{ has queried for records using Eastern Time Zone. AT&T's records are stored and provided in the provided of the$ 

of ST&T

Run Date: 03/23/2025 Run Time: 09:17:33

Voice Usage For: (281)640-4536, (562)355-0834

Item	Conn. Date	Conn. Time (UTC)	Seizure Time	ET	Originating Number	Terminating Number	IMEI	IMSI	CT	Feature
29	11/20/24	00:17:29	0:06	2:43			35168257631221 APPLE IPHONE15	310280113409542	мт	[NIOP]
30	11/20/24	00:20:33	0:04	10:03			35168257631221 APPLE IPHONE15	310280113409542	МТ	[NIOP]
31	11/22/24	20:54:56	0:00	0:00				310280113409542	MT	[NIOP]
32	11/22/24	20:54:57	0:01	0:02				310280113409542	MT	[NIOP:CFNR:VM]
33	11/22/24	20:55:01	0:00	0:00				310280113409542	MT	[NIOP]
34	11/22/24	20:55:02	0:01	0:02				310280113409542	MT	[NIOP:CFNR:VM]
35	11/22/24	20:55:07	0:01	0:00				310280113409542	MT	[NIOP]
36	11/22/24	20:55:08	0:02	0:02				310280113409542	MT	[NIOP:CFNR:VM]
37	11/22/24	21:26:16	0:08	1:27			35168257631221 APPLE IPHONE15	310280113409542	MT	[NIOP:CMW]
38	11/25/24	02:31:15	0:02	0:02			35168257631221 APPLE IPHONE15	310280113409542	мт	[NIOP]
39	11/25/24	02:31:20	0:01	0:01			35168257631221 APPLE IPHONE15	310280113409542	МТ	[NIOP]
40	11/26/24	20:54:34	0:02	0:02			35168257631221 APPLE IPHONE15	310280113409542	МТ	[NIOP]
41	11/26/24	20:54:39	0:01	0:03			35168257631221 APPLE IPHONE15	310280113409542	МТ	[NIOP]
42	11/26/24	20:57:55	0:02	0:03			35168257631221 APPLE IPHONE15	310280113409542	МО	[]
43	11/26/24	21:50:28	0:07	4:11			35168257631221 APPLE IPHONE15	310280113409542	МТ	[NIOP]
44	11/26/24	21:55:32	0:04	0:35			35168257631221 APPLE IPHONE15	310280113409542	МТ	[NIOP]
45	12/12/24	19:28:42	0:01	0:03			35168257631221 APPLE IPHONE15	310280113409542	MT	[NIOP]

### Case 1:24-cv-24228-CMA Document 120 MOBILITY on FLSD Docket 08/14/2025 Page 392 of

4205016.001 03/23/2025

 $\frac{509}{\text{AT&T has queried for records from }10/08/2020\ 12:00:00\text{am to }03/17/2025\ 11:59:59\text{pm}}$ AT&T has queried for records using Eastern Time Zone. AT&T's records are stored and provided in

03/23/2025 Run Date: Run Time: 09:17:33

(281)640-4536, (562)355-0834 Voice Usage For:

Item	Conn. Date	Conn. Time (UTC)	Seizure Time	ET	Originating Number	Terminating Number	IMEI	IMSI	CT	Feature
46	12/12/24	19:28:48	0:01	0:03			35168257631221 APPLE IPHONE15	310280113409542	MT	[NIOP]
47	12/12/24	19:29:02	0:01	0:01			35168257631221 APPLE IPHONE15	310280113409542	MT	[NIOP]
48	12/12/24	19:29:07	0:02	0:01			35168257631221 APPLE IPHONE15	310280113409542	MT	[NIOP]
49	12/12/24	19:29:58	0:01	0:03			35168257631221 APPLE IPHONE15	310280113409542	MO	[]
50	12/12/24	19:30:20	0:14	6:31			35168257631221 APPLE IPHONE15	310280113409542	MO	[]
51	01/09/25	19:44:37	0:04	9:35			35168257631221 APPLE IPHONE15	310280113409542	MT	[NIOP]
52	01/14/25	16:12:35	0:03	0:04			35168257631221 APPLE IPHONE15	310280113409542	MT	[NIOP]
53	01/14/25	16:12:42	0:01	0:03			35168257631221 APPLE IPHONE15	310280113409542	MT	[NIOP]
54	01/14/25	16:13:06	0:05	3:06			35168257631221 APPLE IPHONE15	310280113409542	MO	[]
55	01/31/25	20:13:09	0:01	0:02			35168257631221 APPLE IPHONE15	310280113409542	MT	[NIOP]
56	01/31/25	20:13:14	0:01	0:02			35168257631221 APPLE IPHONE15	310280113409542	MT	[NIOP]
57	01/31/25	20:25:58	0:07	0:02			35168257631221 APPLE IPHONE15	310280113409542	МО	[]
58	01/31/25	20:26:23	0:21	0:00			35168257631221 APPLE IPHONE15	310280113409542	MO	[]
59	01/31/25	20:26:33	0:08	0:02			35168257631221 APPLE IPHONE15	310280113409542	МО	[]

### Case 1:24-cv-24228-CMA Document 120 MOETILETEN on FLSD Docket 08/14/2025 Page 393 of

4205016.001 03/23/2025  $\frac{509}{\text{AT&T has queried for records from }10/08/2020\ 12:00:00\text{am to }03/17/2025\ 11:59:59\text{pm}}$ 

AT&T has queried for records using Eastern Time Zone. AT&T's records are stored and provided in IIIC

STAT&T

Run Date: 03/23/2025

Run Time: 09:17:33

Voice Usage For: (281)640-4536, (562)355-0834

Item	Conn. Date	Conn. Time (UTC)	Seizure Time	ET	Originating Number	Terminating Number	IMEI	IMSI	CT	Feature
60	01/31/25	21:20:45	0:01	0:02			35168257631221 APPLE IPHONE15	310280113409542	МТ	[NIOP]
61	01/31/25	21:20:54	0:01	0:02			35168257631221 APPLE IPHONE15	310280113409542	МТ	[NIOP]
62	01/31/25	21:21:38	0:02	0:02			35168257631221 APPLE IPHONE15	310280113409542	МТ	[NIOP]
63	01/31/25	21:24:00	0:05	4:24			35168257631221 APPLE IPHONE15	310280113409542	MO	[]
64	02/12/25	03:07:14	0:01	0:00				310280113409542	MT	[NIOP]
65	02/12/25	03:07:17	0:04	0:01				310280113409542	MT	[NIOP:CFNR:VM]
66	02/12/25	04:38:32	0:11	0:00			35168257631221 APPLE IPHONE15	310280113409542	MO	[]
67	02/12/25	04:40:14	0:32	0:02			35168257631221 APPLE IPHONE15	310280113409542	MO	[Wi-Fi]
68	02/12/25	18:05:11	0:35	0:02			35168257631221 APPLE IPHONE15	310280113409542	MO	[]
69	02/12/25	19:35:03	0:03	18:02			35168257631221 APPLE IPHONE15	310280113409542	МТ	[Wi-Fi:NIOP]
70	02/13/25	01:35:02	0:08	0:25			35168257631221 APPLE IPHONE15	310280113409542	МТ	[NIOP]
71	02/25/25	02:54:21	0:02	0:04			35168257631221 APPLE IPHONE15	310280113409542	МТ	[Wi-Fi:NIOP]
72	02/25/25	02:54:28	0:01	0:02			35168257631221 APPLE IPHONE15	310280113409542	МТ	[Wi-Fi:NIOP]
73	03/11/25	21:26:40	0:18	0:18			35046582459919 APPLE IPHONE16	310280165961834	MO	[]

### Case 1:24-cv-24228-CMA Document 120 MOBILITY on FLSD Docket 08/14/2025 Page 394 of

4205016.001 03/23/2025 \$509\$ AT&T has queried for records from 10/08/2020 12:00:00am to 03/17/2025 11:59:59pm

AT&T has queried for records using Eastern Time Zone. AT&T's records are stored and provided in

IMEI

STAT&T

Feature

MMS Type

Text
Text
Text
Text
Text
Text

Run Date: 03/23/2025 Run Time: 09:17:33

SMS Usage For: (281)640-4536, (562)355-0834

Item	Conn. Date	Conn. Time (UTC)	Originating Number	Terminating Number
1	10/31/24	21:56:01		
2	10/31/24	21:56:01		
3	11/01/24	03:56:51		
4	11/01/24	03:57:11		
5	11/01/24	03:57:16		
6	11/01/24	20:51:17		
7	11/07/24	19:31:08		
8	11/07/24	19:31:08		
9	11/07/24	19:31:16		
10	11/07/24	19:31:16		
11	01/31/25	20:25:59		
12	01/31/25	20:26:24		
13	01/31/25	20:26:35		

IMSI	Desc
310280113409542	SMSO
	SMST
310280113409542	SMST

Case 1:24-cv-24228-CMA Document 120-2 Entered on FLSD Docket 08/14/2025



## Transcription - 429378-437971921-11152023-112541-DCP\_009-051-5623550834-2003 (Excerpt)

Tory Lanez:

You've got the Megan bitch trying to make it seem like, or the Meghann Cuniff lady trying to make it seem like we don't know what we're doing, which is fine. Because I love being the underdogs. But I love being the underdog who wins the race. And my thing is just like, if we can, if this can help us win the race, then let's use everything that we can use to win the race.

Case 1:24-cv-24228-CMA Document 120-2 Entered on FLSD Docket 08/14/2025



## Transcription - 429378-448169631-12172023-084104-DCP\_007-311-5623550834-2003 (Excerpt)

Tory Lanez: The only name she was just a fucking, just a fucking, was just a

girl coming on Instagram Live.

Ceasar McDowell Oh, with, I forgot that girl's name, the, the it was the Milagro one.

You talking about that one?

Tory Lanez: No, I'm talking about the girl, the girl from the whole case. Like,

Megan, I'm talking about her.

Ceasar McDowell: Oh, oh, oh.



# Transcription - 2024.11.14 - 429378-550656891-11152024-191131-DCP\_007-225-5623550834-2003 (Excerpt)

Ceasar McDowell: Did you hear about that new case we got with Milagro, and

that the lawyers from Roc Nation, or something like that?

Tory Lanez: Oh, yeah, I don't know anything about it.

Ceasar McDowell: Yeah, yeah, yeah, yeah, I forgot, I didn't even

remember if I told you we got that case, but, yeah, that one's crazy. This, that case, they're talking about...

Tory Lanez: Oh, I know what you're talking about.

Ceasar McDowell: They're suing, they're suing, yeah, they're suing the girl,

Milagro, and saying, whoop dee whop. So, yeah, I didn't even tell you about that case yet, but, yeah, we got that

case with us.

Automated Voice: This call and your telephone number will be monitored and

recorded.

Ceasar McDowell: Saying that she was slandering

Tory Lanez: I saw that shit online. Aren't they like saying some weird

shit about me too? Like saying, oh, relinquish all your

communication and all kinds of shit.

Ceasar McDowell: Oh yeah, yeah, matter of fact . Yeah, they was even saying

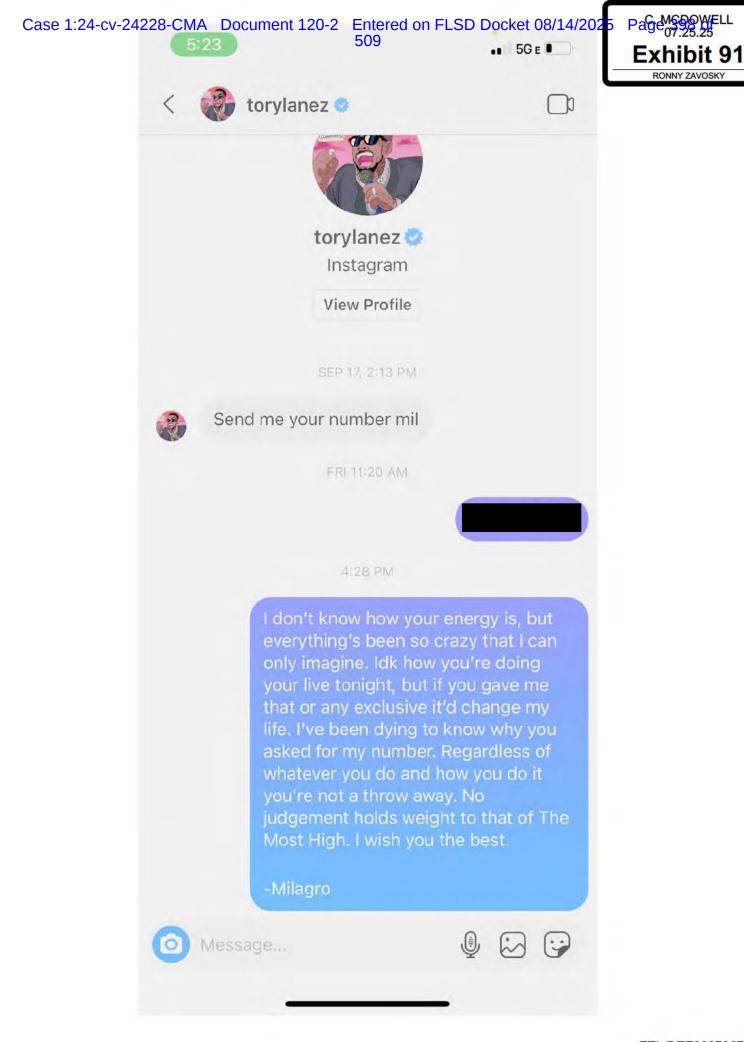
some shit like, hey, you're right. Yeah, they were saying some shit about that case about you to something about, oh, she was communicating with you or some bullshit. I

don't know about that case. I mean, I don't know.

Tory Lanez: Like yeah, the funniest thing about this whole thing is like

when they go looking and they find nothing, they're going

to be like, what?









# torylanez 🌼

11M followers · 618 posts
You follow each other on Instagram
You both follow unitethepeopleusa and 12 others

## View profile

You started a chat with torylanez. We use information from this chat to improve your experience. Learn about business chats and your privacy.

DEC 13, 2022

What's ya number gotta ask u something



DEC 13, 2022



Case 1:24-cv-24228-CMA Document 120-2 Entered on FLSD Docket 08/14/2025 Page 07:25.25 509

Messages - Daystar Peterson

RONNY ZAVOSKY

iMessage 12/21/2022 11:33:20 PM

Yoooooow It's Tory Hit me

## Transcription - 429378-551965905-11192024-211622-DCP\_009-238-5623550834-2003 (Excerpt)

Ceasar McDowell:

I had to pay \$5,000 today to retain that firm in Florida just so that

we can use have their, their shit just like the pro-hac.



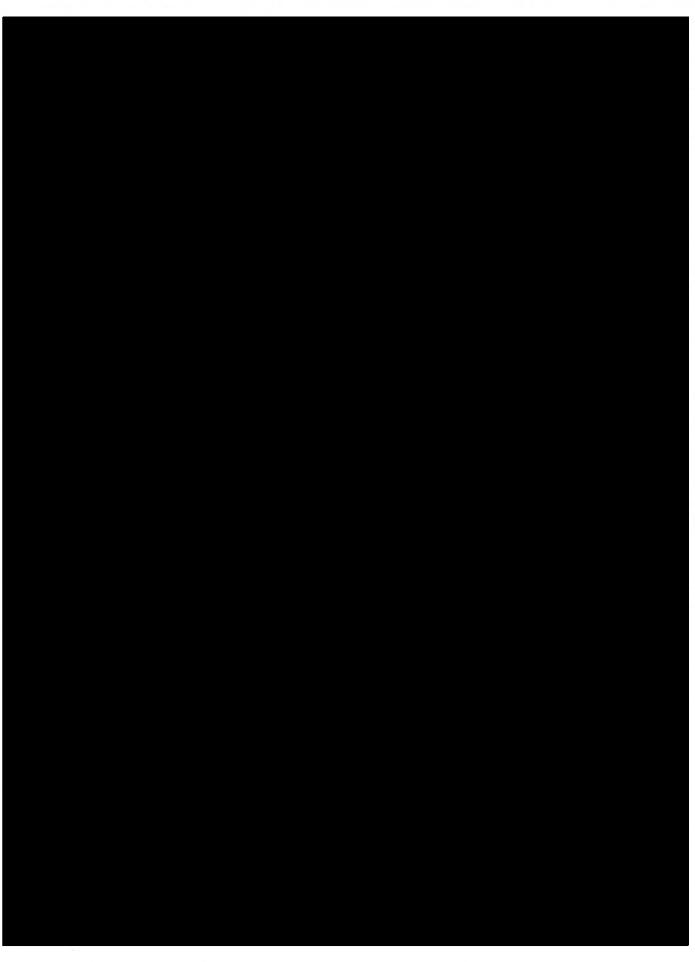
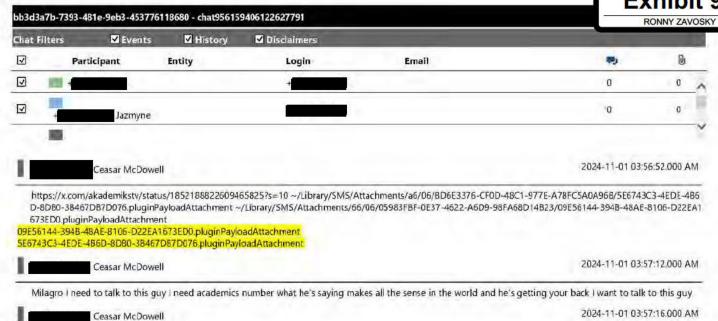


Exhibit 96



Ceasar McDowell

You set that up please tell him the CEO of unite the people wants to talk to him

2024-11-01 08:51:18.000 PM

Milagro calling you in 5 min with the lawyers

CONFIDENTIAL FTI DEF0000755 Case 1:24-cv-24228-CMA Document 120-2 Entered on FLSD Docket 08/14/2025 Page 07:25.25

14538bdc-b9db-4c67-a2e5-9aec8411b6ca - +15623550834				RONNY ZAVOSK			
Chat Filters	<b>☑</b> Events	☑ History	<b>☑</b> Disclaimers	U 90		CONT ENGO	
☑ P	articipant	Entity	Login	Email	*)	0	
<b>₩</b> +1	4		+		0	0 🔥	
Dowell	Ceasar Mc		+1		3	0 ~	
	Ceasar McDowell	i			2024-11-07 07:21:21:000 PM		
Can you cal	me it's important th	nank you					
	Ceasar McDowell	L			2024-11-07 07:3	1:09.000 PM	
I'll call you l	oack.						
4 Ceasar McDowell			2024-11-07 07:31:17,000 PM				
I'll call you t	ack.						
	Milagro				2024-11-07 07:3	1:19:000 PM	
Ok							
W .	Milagro				2024-11-07 07 3	1-24 000 PM	

CONFIDENTIAL FTI\_DEF0000013 Case 1:24-cv-24228-CMA Document 120-2 Entered on FLSD Docket 08/14/2025 Page 07:25.25

Exhibit 98

14538bdc-b9db-4c67-a2e5-9aec8411b6ca - +15623550834					RONNY ZAVOSKY	
Chat Filters	✓ Events	☑ History	☑ Disclaimers			
☑ Pa	rticipant	Entity	Login	Email	<b>#</b> )	0
<b>V</b>	a la				D'	0 ^
✓ Dowell	Ceasar Mo				Ť	0 _
1	Ceasar McDowe	11			2024-12-12 07:	29:22,000 PM

Hey when you get a chance if you could give me a call that would be great as soon as possible

CONFIDENTIAL FTI\_DEF0000016 Case 1:24-cv-24228-CMA Document 120-2 Entered on FLSD Docket 08/14/2025 Page 408 of 509 Page Vault

Document title: (1) Milagro on X: "Tory Lanez, his father Sonstar Peterson, and blogger Milagro

Gramz are firing back at claims from Megan Thee Stallion's lawyers that they're conspiring to spread misinformation and harass the Roc Nation rapper in a complaint

filed this week. The allegations largely stem from https://t.co/pmffNvIMM9" / X

Capture URL: https://x.com/MobzWorld/status/1867646509606477983

Page loaded at (UTC): Sun, 23 Feb 2025 02:35:01 GMT

Capture timestamp (UTC): Sun, 23 Feb 2025 02:35:59 GMT

Capture tool: 10.55.0

Collection server IP: 54.145.42.72

Browser engine: Mozilla/5.0 (X11; Linux x86\_64) AppleWebKit/537.36 (KHTML, like Gecko)

Chrome/126.0.6478.234 Safari/537.36

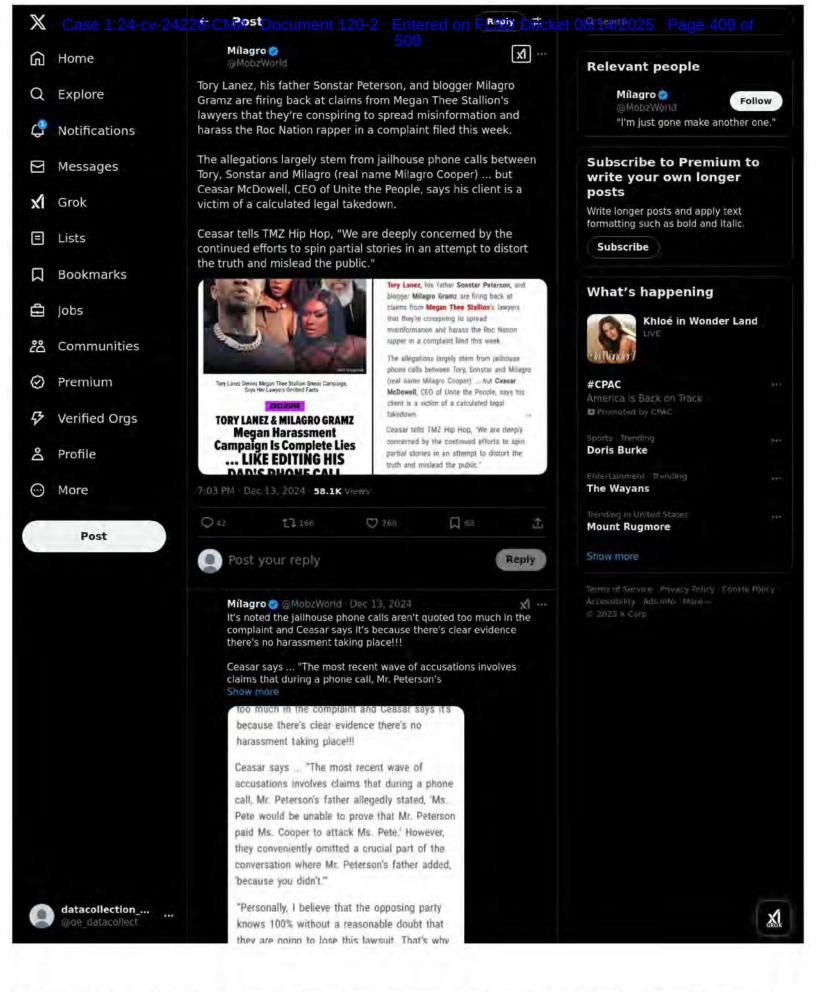
Operating system: Linux (Node 20.17.0)

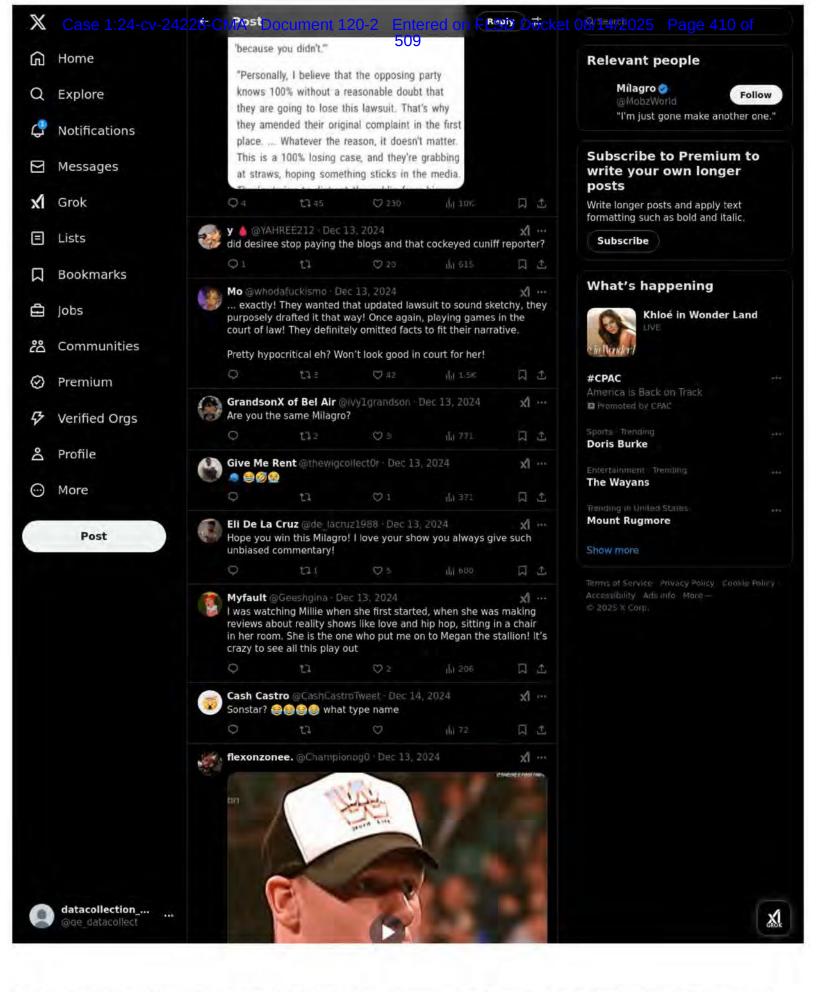
Capture ID: 8DPKak6EMTJFY8bce43FAw

PDF REFERENCE #: tDj33hPFdtfUsrRQJBb7Ro

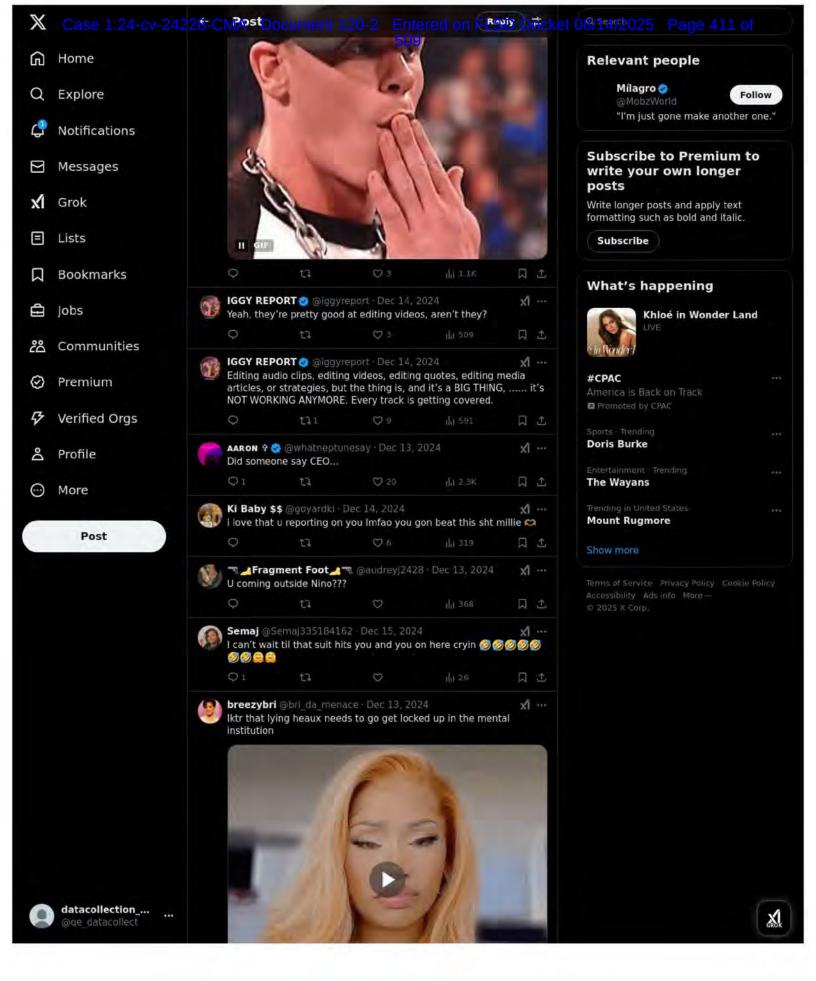
C. MCDOWELL 07.25.25

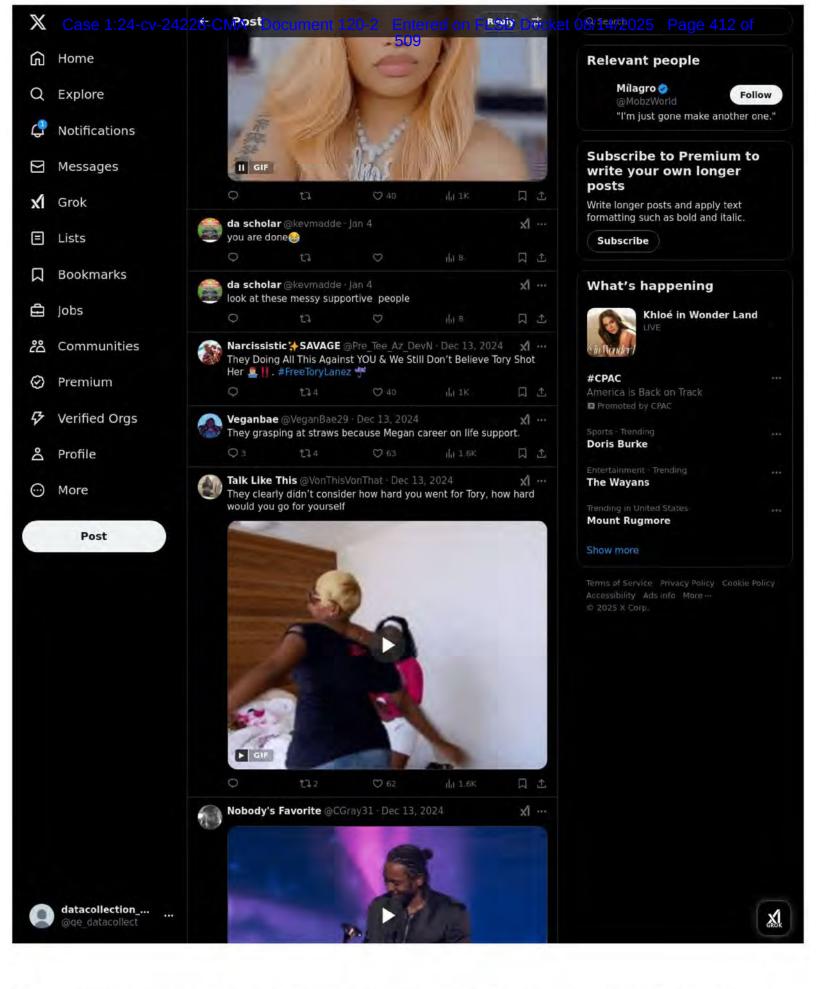
Exhibit 99

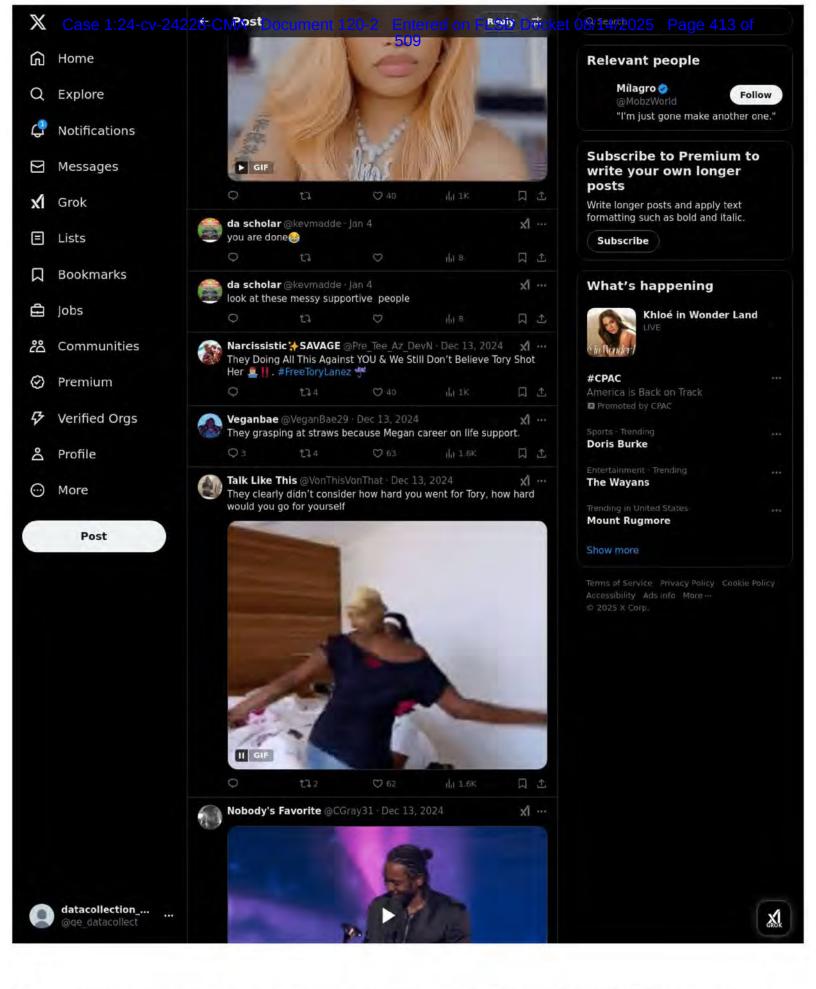




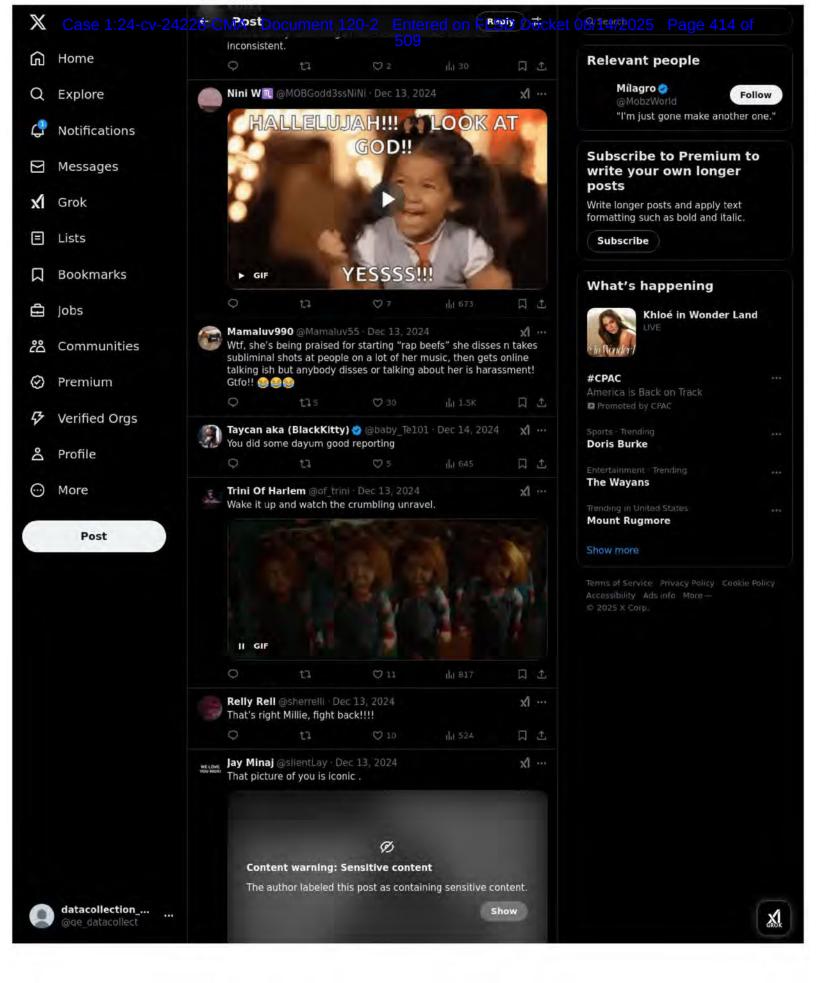
Document title: (1) Mílagro on X: "Tory Lanez, his father Sonstar Peterson, and blogger Milagro Gramz are firing back at claims from Megan Thee Stallion's... Capture URL: https://x.com/MobzWorld/status/1867646509606477983



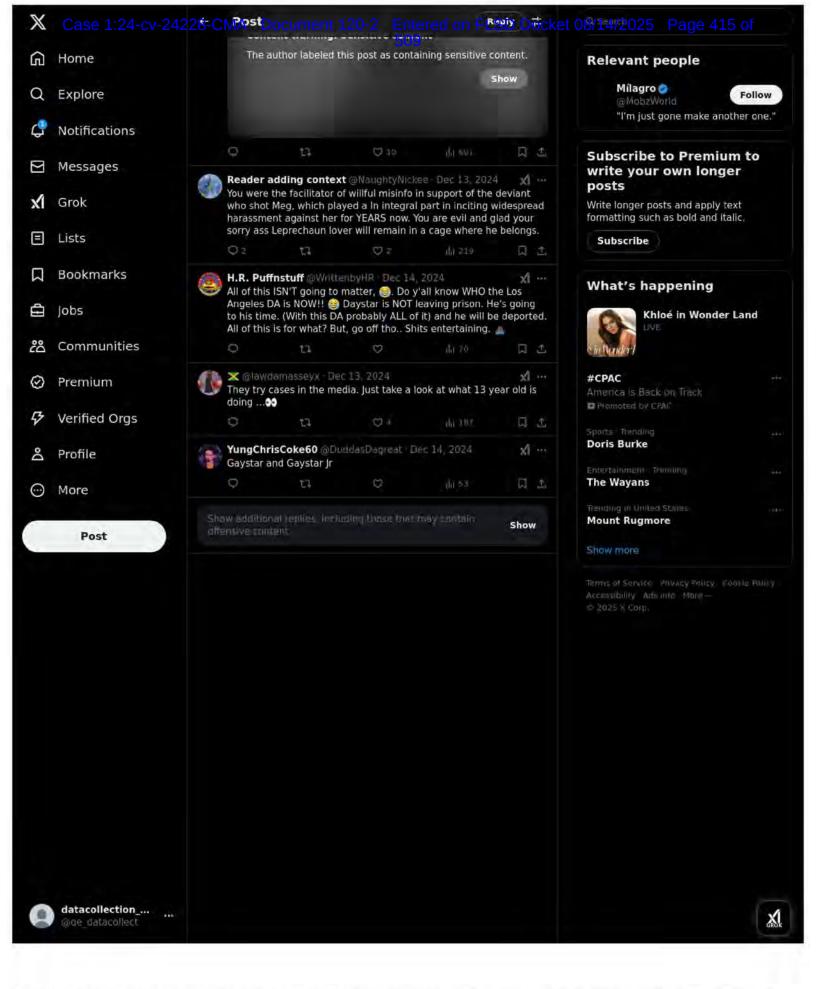




Document title: (1) Mílagro on X: "Tory Lanez, his father Sonstar Peterson, and blogger Milagro Gramz are firing back at claims from Megan Thee Stallion's... Capture URL: https://x.com/MobzWorld/status/1867646509606477983

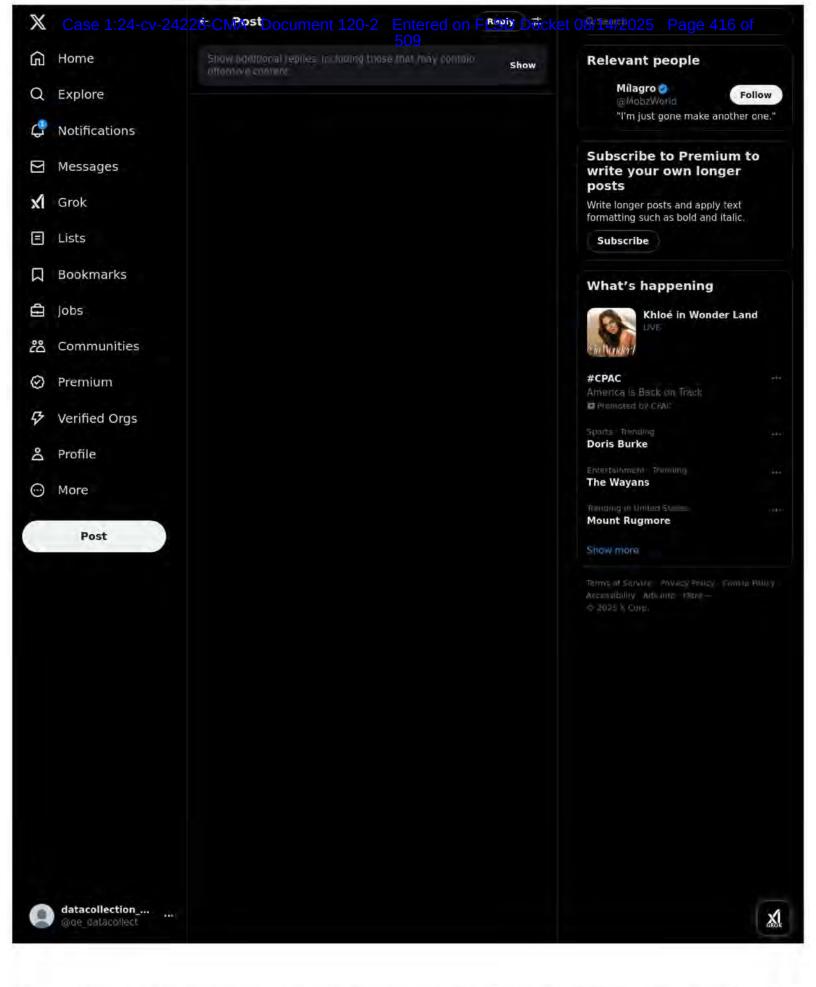


Document title: (1) Mílagro on X: "Tory Lanez, his father Sonstar Peterson, and blogger Milagro Gramz are firing back at claims from Megan Thee Stallion's... Capture URL: https://x.com/MobzWorld/status/1867646509606477983



Document title: (1) Milagro on X: "Tory Lanez, his father Sonstar Peterson, and blogger Milagro Gramz are firing back at claims from Megan Thee Stallion's...

Capture timestamp (UTC): Sun, 23 Feb 2025 02:35:59 GMT



Document title: (1) Milagro on X: "Tory Lanez, his father Sonstar Peterson, and blogger Milagro Gramz are firing back at claims from Megan Thee Stallion's...

Case 1:24-cv-24228-CMA Document 120-2 Entered on FLSD Docket 08/14/2025 Page 417 of 509 Page Vault

Document title: Instagram

Capture URL: https://www.instagram.com/p/DGeUsyxSUS\_/?igsh=NjZlM2M3MzIxNA%3D%3D

Page loaded at (UTC): Mon, 07 Apr 2025 17:58:52 GMT

Capture timestamp (UTC): Mon, 07 Apr 2025 18:00:06 GMT

Capture tool: 10.55.0

Collection server IP: 54.145.42.72

Browser engine: Mozilla/5.0 (X11; Linux x86\_64) AppleWebKit/537.36 (KHTML, like Gecko)

Chrome/126.0.6478.234 Safari/537.36

Operating system: Linux (Node 20.17.0)

PDF length: 3

Capture ID: 63VobdnowHx7c8T4dVPJ23

Display Name: brandondietzman

PDF REFERENCE #: 5YLuErwmTtDatPbxfiYViJ

C. MCDOWELL 07.25.25

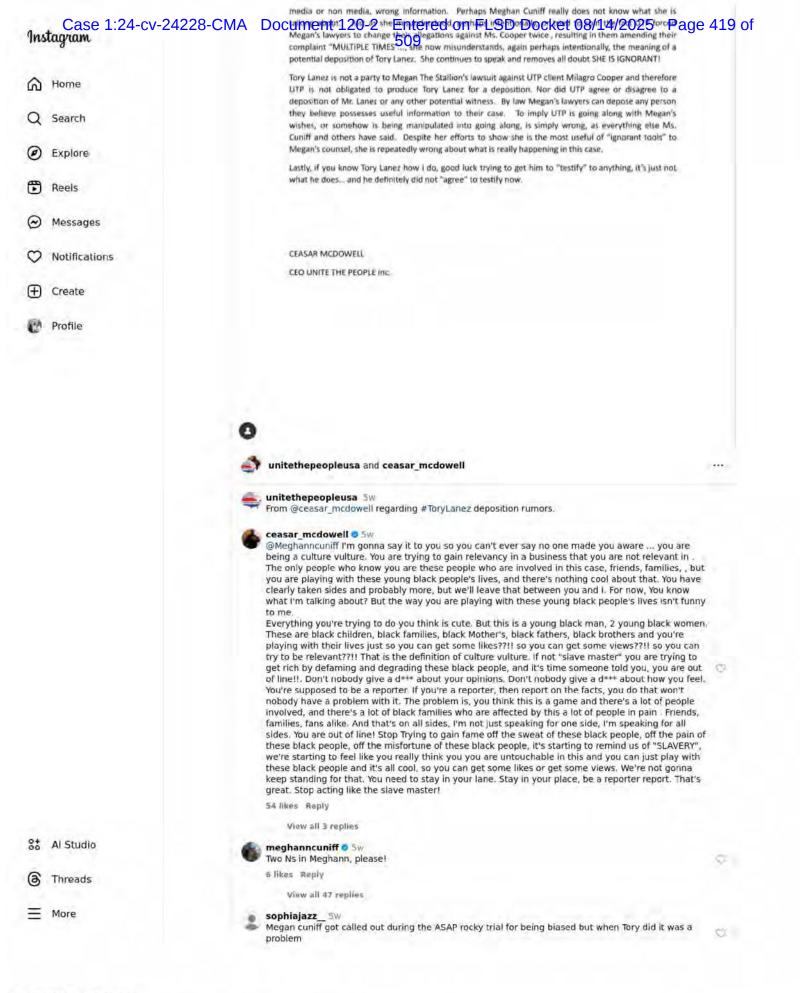
Exhibit 100

Ins	Case 1:24-cv-24228-CMA tagram	Document 120-2 Entered on FLSD Docket 08/14/2025 Page 509	418 o
ഹ	Home		
Q	Search		
0	Explore	UNITE THE PEOPLE Inc. CEO CEASAR McDOWELL SETS THE RECORD STRAIGHT ON DEPOSITION. (IN RE TORY LANEZ)	
•	Reels	Lately I haven't been responding to all the rhetoric in the media but after reading, the misinformation attempted to be spread by the media "puppet or puppets" I can no longer bite my tongue.	
0	Messages	Megan The Stallion's lawyers continue to try and give the appearance their case against Milagro Cooper is successfully progressing by giving their "supposed mouthpiece", Meghan Cuniff and all other persons, media or non media, wrong information. Perhaps Meghan Cuniff really does not know what she is	
0	Notifications	talking about. Just as she misunderstood, perhaps intentionally, or tried to spin the fact UTP forced Megan's lawyers to change their allegations against Ms. Cooper twice , resulting in them amending their complaint "MULTIPLE TIMES", she now misunderstands, again perhaps intentionally, the meaning of a potential deposition of Tory Lanez. She continues to speak and removes all doubt SHE IS (GNORANT)	
<b></b>	Create	Tory Lanez is not a party to Megan The Stallion's lawsuit against UTP client Milagro Cooper and therefore UTP is not obligated to produce Tory Lanez for a deposition. Nor did UTP agree or disagree to a	
2	Profile	deposition of Mr Lanet or any other potential witness. By law Megan's lawyers can depose any person they believe possesses useful information to their case. To imply UTP is going along with Megan's wishes, or somehow is being manipulated into going along, is simply wrong, as everything else Ms. Cuniff and others have said. Despite her efforts to show she is the most useful of "ignorant tools" to Megan's counsel, she is repeatedly wrong about what is really happening in this case.	
		Lastly, if you know Tory Lanez how I do, good luck trying to get him to "testify" to anything, It's just not what he does and he definitely did not "agree" to testify now.	
		CEASAR MCDOWELL	
		CEO UNITE THE PEOPLE INC.	
	0		
	4	unitethepeopleusa and ceasar_mcdowell	***
	4	unitethepeopleusa 5w From @ceasar_mcdowell regarding #ToryLanez deposition rumors.	
0.4		ceasar_mcdowell 5 5w  @Meghanncuniff I'm gonna say it to you so you can't ever say no one made you aware you are being a culture vulture. You are trying to gain relevancy in a business that you are not relevant in . The only people who know you are these people who are involved in this case, friends, families, , but you are playing with these young black people's lives, and there's nothing cool about that. You have clearly taken sides and probably more, but we'll leave that between you and I. For now, You know what I'm talking about? But the way you are playing with these young black people's lives isn't funny to me.	
000	Al Studio	Everything you're trying to do you think is cute. But this is a young black man, 2 young black women These are black children, black families, black Mother's, black fathers, black brothers and you're playing with their lives just so you can get some likes??!! so you can get some views??!! so you can	K.
(3)	Threads	try to be relevant??!! That is the definition of culture vulture. If not "slave master" you are trying to get rich by defaming and degrading these black people, and it's time someone told you, you are out of line!!. Don't nobody give a d*** about your opinions. Don't nobody give a d*** about how you feel.	
Ξ	More	You're supposed to be a reporter. If you're a reporter, then report on the facts, you do that won't nobody have a problem with it. The problem is, you think this is a game and there's a lot of people	N.

Document title: Instagram

Capture URL: https://www.instagram.com/p/DGeUsyxSUS\_/?igsh=NjZiM2M3MzIxNA%3D%3D

Capture timestamp (UTC): Mon, 07 Apr 2025 18:00:06 GMT



Document title: Instagram

Capture URL: https://www.instagram.com/p/DGeUsyxSUS\_/?igsh=NjZiM2M3MzIxNA%3D%3D

Capture timestamp (UTC): Mon, 07 Apr 2025 18:00:06 GMT



## Transcription: 429378-546481079-11012024-231138-DCP\_018-057-5623550834-2003 — Excerpt #2

Tory Lanez: Hey, let me ask you something, bro. You don't think we should uh uh uh ...

You don't think we should do another another bailout? Like...

Ceasar McDowell: You know, that would be kind of fire.

Tory Lanez: Get some get some cheaper bails. Like niggas who have like small bills,

but they really just can't afford it. Like, get some cheap ones and that way you can still give some money to the firm? I'm saying like we get some

cheap bails like - but just get as many you know what I mean?

Ceasar McDowell: Yeah, I hear you. I - we could uh you know that might be another good

look - but I really want you to sit on your money for you know what I

mean? I mean we we can.

Tory Lanez: I'm saying - I'm saying instead of doing like instead of doing um the

Hands of God for prisoners one month, maybe we just do the niggers in

time in jail. You know what I'm saying?

Ceasar McDowell: Yeah, we could do that. But I tell you what we do. We make it bigger this

time. Tory Lanez donated \$100,000 and he still be 30. You know what I mean? And just be like, man, you know, and whoo whoo whoo wap just

make it bigger.

Automated: You have 60 seconds remaining.

Ceasar McDowell: Oh, damn it. But uh yeah, we we could do some shit. Like I really want to

holla atchu about this Milagro shit and my ideas and see what you think -

cuz I got to get to on to the [indiscernible]

Tory Lanez: We'll talk tomorrow in the morning about it.

Ceasar McDowell: Yeah, cuz I I got to get at the people, man. So, hit me up when you get

some time, bro.

Tory Lanez: I'll hit you in the morning when I get up.

### **Transcription**

## 2025.04.15 - Tory Lanez Court Nightmare - Excerpt #2

### Milagro Elizabeth Cooper:

Then they said Mr. Peterson denied knowing if he discussed or approved or authorized the statement made by Unite the People in which Mr. McDowell stated that Mr. Peterson would not testify because Mr. Peterson claimed to not understand the definition of 'discuss' or 'approve'.

Ms. Henderson said "Did you discuss approve or authorize any statement made by Unite the People regarding your deposition today?"

Mr. Peterson said "I would like the definitions of discuss approve and whatever you said - Can you give me those please?"

Ms. Henderson said "Okay so my you don't understand the word discuss."

Mr. Peterson said "No but I would like the definitions." I want your definition because you're asking me the questions so I would like your definitions Ms. Henderson thank you.

Ms. Henderson said "Okay." So did you speak with or talk to anyone at Unite the People about your deposition.

No I'm asking you for the definition of discuss can you give me that please from Webster?

And I'm going to read it just as a conversation at this point and look at the screen to keep track.

Mr. Peterson did you talk to anyone at Unite the People about a statement regarding your deposition.

You still haven't given me the definition of the words that you first asked and I'm asking you for those so I can give you a clear and understandable answer.

## **Transcription**

## 2025.04.15 - Tory Lanez Court Nightmare - Excerpt #1

Milagro Elizabeth Cooper: and I also firmly believe that there are some people who have some feelings about my proximity to Daystar . I..I do think that there are people jealous about my relationship of sorts. What, However you want to name. A relationship can be a friendship, a business relationship, whatever - Don't make it romantic.

> I think that there are a lot of people who are uh very - they they feel a way about the fact - I think people feel away about the fact that that Tory daddy loves me. I think people feel a way about the fact that you know other people care for me. I, I do. Yeah I do - but we will digress at this time now.

Case 1:24-cv-24228-CMA Document 120-2 Entered on FLSD Docket 08/14/2025

Page MCDOWELL 07.25.25 Exhibit 104-B

Transcription 2025.05.14 – Press Conference – Excerpt #1

Walter Roberts: The only party that responded was last week was Megan Pete's representatives with a request for more information. A few days

later Mr. Peterson is brutally attacked in a jail cell.

Transcription 2025.05.14 - Press Conference - Excerpt #2

Mr. Peterson was never given a fair trial free from bias, political interference and media driven pressure. He cont - His continued incarceration erodes public trust and diverts focus from the real real work of keeping our community safe.

Further while incarcerated Mr. Peterson was recently stabbed in prison. As many of you know, a tragic incident that underscores the urgency of this situation and the risk to his life while this case remains un-adressed.

EXHIBIT 105 13 WIT: MC O OWEM DATE: 7-25-25 RONNY ZAVOSKY, CSR 12359 Case 1:24-cv-24228-CMA Document 120-2 Entered on FLSD Docket 08/14/2025

Exhibit 106-B

## **Transcription**

## 2025.05.14 - Press Conference - Excerpt #3

## **Diana London:**

After over two years in prison - uh after over two years in prison without incident, Tory was stabbed 14 times. Just days after a major national news outlet reached out to Megan Pete's team, Kelsey Harris and former DA George Gascone about a story on new evidence in this case.

You don't have to believe in conspiracies to see the pattern. When evidence was about to come to light, Tory was nearly killed. So let's stop pretending this is complicated. Let's stop treating this like some cultural war flash point.

**Transcription** 

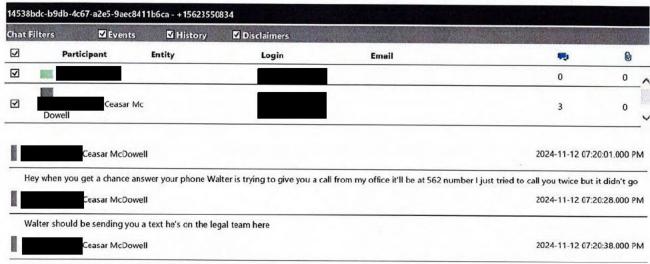
2025.05.16 - x.com - Milagro is Broke - Excerpt

<u>Milagro Elizabeth Cooper:</u> They absolutely implicated Roc Nation in the attempted murder of Daystar Peterson. on national news. That's what you saw. That is exactly what you saw.

And he also gave a lightly veiled, I wouldn't call it a threat, but a lightly veiled, I don't I don't know what the fuck you want to call it. Hey, I don't know. But I felt like he was touching on Desiree Perez because he says something to the effect of or was questioning why an executive in that position from a record company would be in the room with a victim.

Why was this person in the room with Kelsey Harris? What the fuck is going on?





He just wants to update you that there's nothing to worry about I'm sure

EXHIBIT DO WIT: MCODWELL DATE: 7-25-25 RONNY ZAVOSKY, CSR 12359

Case 1:24-cv-24228-CMA Document 120-2 Entered on FLSD Docket 08/14/2025 Page 428 of 509 Page Vault —

Document title: Walter James Roberts IV # 225339 - Attorney Licensee Search

https://apps.calbar.ca.gov/attorney/Licensee/Detail/225339

Page loaded at (UTC): Wed, 23 Jul 2025 18:40:26 GMT

Capture timestamp (UTC): Wed, 23 Jul 2025 18:41:25 GMT

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Chrome/138.0.7204.97 Safari/537.36

Operating system: Linux (Node 22.17.0)

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Display Name: brandondietzman

C. MCDOWELL 07.25.25 Exhibit 100

Exhibit 109
RONNY ZAVOSKY

PDF REFERENCE #: 507

507p7iWgwJymkpEk5r45AV

G Select Language ▼

#### Attorney Profile

#### Walter James Roberts IV #225339

License Status: Disbarred

This licensee is prohibited from practicing law in California by order of the California Supreme Court.

#### **CONSUMER ALERT**

This attorney is disbarred from the practice of law. As a result, the attorney is ineligible to practice law in California. The State Bar posts consumer alerts online when attorneys are disbarred. The decision(s) or order(s) are posted on the **State Bar Court Smart Search**. Anyone who believes they have been the victim of attorney misconduct is urged to file a complaint with the State Bar.

Address: 8726 S. Sepulveda Blvd., A102, Los Angeles, CA 90045

Phone: Not Available | Fax: Not Available

Email: robertslaw4@aol.com | Website: Not Available

#### More about This Attorney \*

#### License Status, Disciplinary and Administrative History

The table below shows an attorney's license status changes, disciplinary actions, and administrative actions. Some administrative suspensions are subject to automatic removal from the attorney profile page pursuant to the State Bar's **policy on removal of administrative actions**. Administrative suspensions are non-disciplinary actions resulting from noncompliance with administrative requirements, such as the requirement to pay licensing fees or comply with Minimum Continuing Legal Education. Administrative suspensions that meet the criteria in the State Bar's policy on removal of administrative actions would not be displayed below.

Date	License Status 0	Discipline <b>1</b>	Administrative Action 6
Present	Disbarred		
9/14/2011	Disbarred	Disbarment 10-N-06977 🐧	
7/1/2011	Not eligible to practice law in CA		Suspended, failed to pay fees
4/23/2011	Not eligible to practice law in CA	Ordered inactive 10-N-06977	
5/2/2010	Not eligible to practice law in CA	Discipline w/actual suspension 08-0-10110 <b>❸</b>	
4/13/2007	Active		
3/16/2007	Not eligible to practice law in	Discipline w/actual suspension 06-0-10128 6	

CA Not eligible to Suspended, failed to pass 2/20/2007 practice law in Prof.Resp.Exam 04-0-11044 CA 9/28/2006 Active Not eligible to Suspended, failed 9/18/2006 practice law in to pay fees CA Discipline, probation; no actual 7/31/2005 susp. 04-0-11044 6 Disciplinary charges filed in 10/6/2004 State Bar Court 04-0-11044 6

#### Admitted to the State Bar of California 6/3/2003

#### State Bar Court Cases

The listing below is partial, as the State Bar Court is transitioning to online dockets. Please refer to the License Status, Disciplinary and Administrative History section above for a record of discipline cases. Case dockets and documents may be available using the State Bar Court Search for a Case feature; see instructions below.

Effective Date 1	Case Number	Description 6
9/14/2011	10-N-06977	Stipulation [PDF] [HTML]
5/2/2010	08-0-10110	Stipulation [PDF] [HTML]
3/16/2007	06-0-10128	Stipulation [PDF] [HTML]
3/16/2007	06-0-10128	Modification Order [PDF]

Here is what you need to know to access discipline documents in public cases:

Documents are added to the State Bar Court's online docket as events occur.

Search for a Case

To search for a case, please copy the case number displayed above and click Search for a Case. In the search box, paste the complete case number. If the case number begins with "19" or higher, you must add the prefix SBC to the case number, e.g., SBC [CASE NUMBER]. If a case number begins with 18 or lower, there's no need to add SBC.

Most public case records since 2000 are available through search. Older case records are available on request. The State Bar Court began posting public discipline documents online in 2005.

NOTE: Only Published Opinions may be cited or relied on as precedent in State Bar Court proceedings.

DISCLAIMER: Any posted Notice of Disciplinary Charges, Conviction Transmittal or other initiating document, contains only allegations of professional misconduct. The licensee is presumed to be innocent of any misconduct.

The State Bar 34228 CMA Document 120-2 Entered on El SD Docket 08/14/2025 and Page 431

3/16/2007

06-0-10128

Modification Order [PDF]

Here is what you need to know to access discipline documents in public cases:

Documents are added to the State Bar Court's online docket as events occur.

Search for a Case

To search for a case, please copy the case number displayed above and click Search for a Case. In the search box, paste the complete case number. If the case number begins with "19" or higher, you must add the prefix SBC to the case number, e.g., SBC [CASE NUMBER]. If a case number begins with 18 or lower, there's no need to add SBC.

Most public case records since 2000 are available through search. Older case records are available on request. The State Bar Court began posting public discipline documents online in 2005.

NOTE: Only Published Opinions may be cited or relied on as precedent in State Bar Court proceedings.

DISCLAIMER: Any posted Notice of Disciplinary Charges, Conviction Transmittal or other initiating document, contains only allegations of professional misconduct. The licensee is presumed to be innocent of any misconduct warranting discipline until the charges have been proven.

#### Additional Information:

· About the disciplinary system

Start New Search »





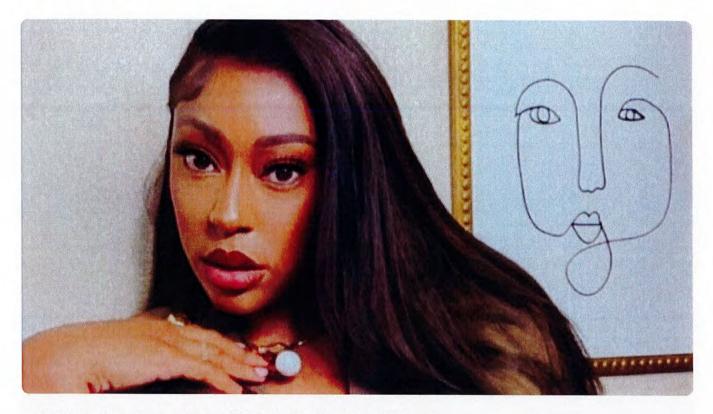




Document title: Walter James Roberts IV # 225339 - Attorney Licensee Search Capture URL: https://apps.calbar.ca.gov/attorney/Licensee/Detail/225339 Capture timestamp (UTC): Wed, 23 Jul 2025 18:41:25 GMT







## Milagro Gramz Official Defense Fund

Goal: USD \$100,000

Campaign created by Milagro Cooper

Campaign funds will be received by Milagro Cooper



## Milagro Gramz Official Defense Fund

My name is Milagro Gramz and I'm being sued by an artist backed by one of the most powerful companies in music. Like many from my generation, I have used the internet to build a community and speak to important issues. In doing so, I defended Tory Lanez against claims that he had committed a heinous crime. This decision has put a target on my back and mounting legal fees could result in a miscarriage of justice. The courts are being

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6/3/25, 3:56 PM

GiveSend Milagro Gramz Official Defense Fund Milagro today but with the precedent this would set it could be you tomorrow. Every

Recent Donations			
Show: Most Recent •			
DaMarcusMom			
2 days ago			
A Father, send Your angelic hosts to surround the co	ourtroom and ensure righteous		
judgment in Milagro's favor. Break the power of every	word curse spoken against		
ner legal victory, in the name of Jesus. We declare that no lawyer, judge, or officia			
will be able to withstand the wisdom and power of God on my behalf (Luke 21:1!			
<b>♥</b> 1			
SpiceTheGod			
2 days ago			
We argue like family & we love you like family Mila . 7	Γhe mob got you □		
<b>•</b> 2			
Anonymous Giver			
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GiveSend Milagro Gramz Official Defense Fund

### **Updates**

#### Update #1

February 28th, 2025

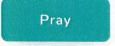
It has been less than three days and we have already raised \$10K!

Someone recently told me they felt like they were a part of something that mattered, and I said, "You are." This lawsuit stems from one of the biggest cases in

Follow

## **Prayer Requests**

Click the Pray button to let the campaign owner know you are praying for them.

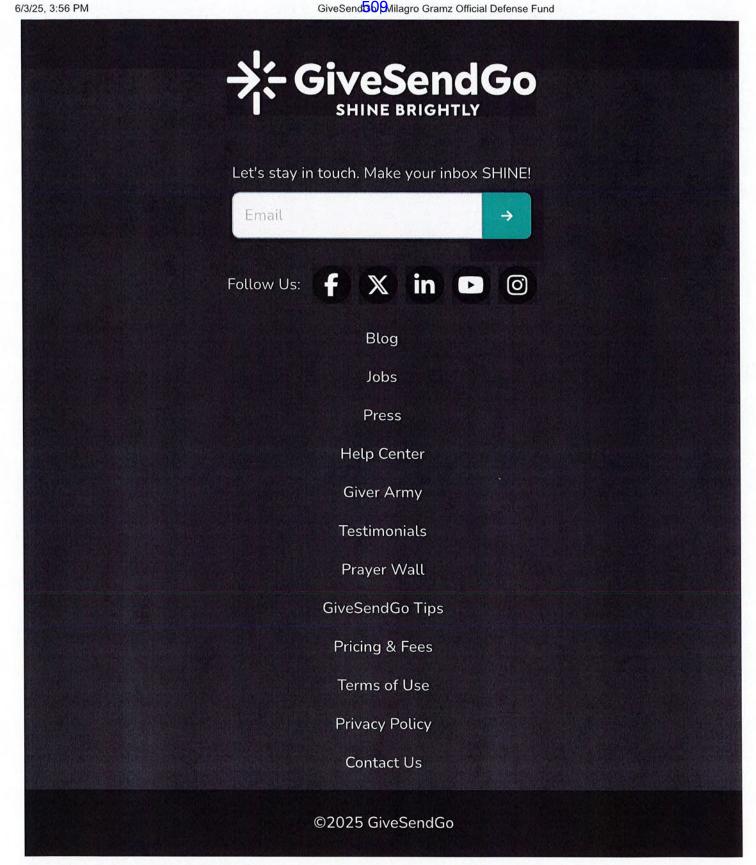


# GiveSendGo

The place where help and hope go hand in hand.

Start a GiveSendGo
Support GiveSendGo

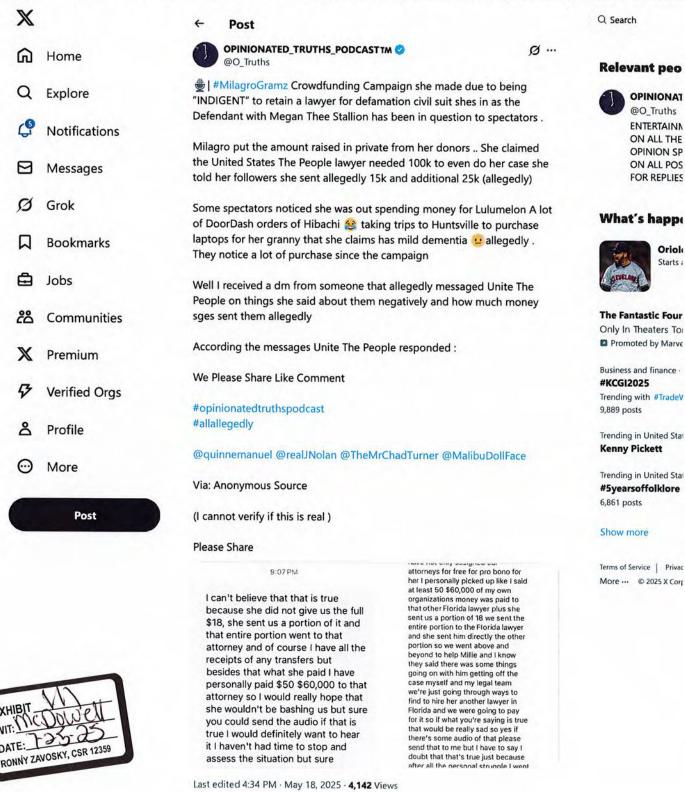
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#### Case 1:24-cv-24228-CMA Document 120-2 Entered on FLSD Docket 08/14/2025 Page 436 of

(5) OPINIONATED\_TRUTHS\_PODCAST 100 on X 50 P#MilagroGramz Crowdfunding Campaign she made due to being "INDIGEN... 7/24/25, 9:54 AM



RONNY ZAVOSKY, CSR 12359

Ms. Bree 🦜 @RapGirlsWorld · May 19

Parody account

17 24

02

Ø ...

Reply

土

Considering the lack of punctuation and grammatical errors I would say it's

O 67

Q 16

Case 1:24-cv-24228-CMA Document 120-2 Entered on FLSD Docket 08/14/2025 Page 437 of 7/24/25, 9:54 AM (5) OPINIONATED\_TRUTHS\_PODCAST mo on X:50 p#MilagroGramz Crowdfunding Campaign she made due to being "INDIGEN... take put I also don t expect much from UIP. X Q tì O 1 口土 ılı 77 6 Home This Post was deleted by the Post author. Learn more Q Explore Notifications Messages Ø Grok Bookmarks Jobs Communities X Premium Verified Orgs Profile 0 More



Post



And I would really hope she wouldn't be bassing us because we have not only assigned our attorneys for free for pro bono for her I personally picked up like I said at least 50 \$60,000 of my own organizations money was paid to that other Florida lawyer plus she sent us a portion of 18 we sent the entire portion to the Florida lawyer and she sent him directly the other portion so we went above and beyond to help Millie and I know they said there was some things going on with him getting off the case myself and my legal team we're just going through ways to find to hire her another lawyer in Florida and we were going to pay for it so if what you're saying is true that would be really sad so yes if there's some audio of that please send that to me but I have to say I doubt that that's true just because after all the personal struggle I went through to make sure this guy in Florida was getting paid I'm the only one that paid personal money to help her she raised money on a platform I paid

#### 9:07 PM

I can't believe that that is true because she did not give us the full \$18, she sent us a portion of it and that entire portion went to that attorney and of course I have all the receipts of any transfers but besides that what she paid I have personally paid \$50 \$60,000 to that attorney so I would really hope that she wouldn't be bashing us but sure you could send the audio if that is true I would definitely want to hear it I haven't had time to stop and assess the situation but sure



Case 1:24-cv-24228-CMA Document 120-2 Entered on FLSD Docket 08/14/2025 Page 440 of 509 Page Vault —

Document title: (1) Mílagro on X: "Also, unfortunately Unite The People, who publicly asserted that

they would take on my case of no cost to me, doesn@have the resources to challenge the machine. They withdrew, as the Florida lawyer did for this same

reason. Anything else is defamation and the shit is just" / X

Capture URL: https://x.com/NewMediaaaa/status/1926618838482776312

Page loaded at (UTC): Sun, 25 May 2025 19:45:50 GMT

Capture timestamp (UTC): Sun, 25 May 2025 19:46:27 GMT

Capture tool: 10.55.0

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Browser engine: Mozilla/5.0 (X11; Linux x86\_64) AppleWebKit/537.36 (KHTML, like Gecko)

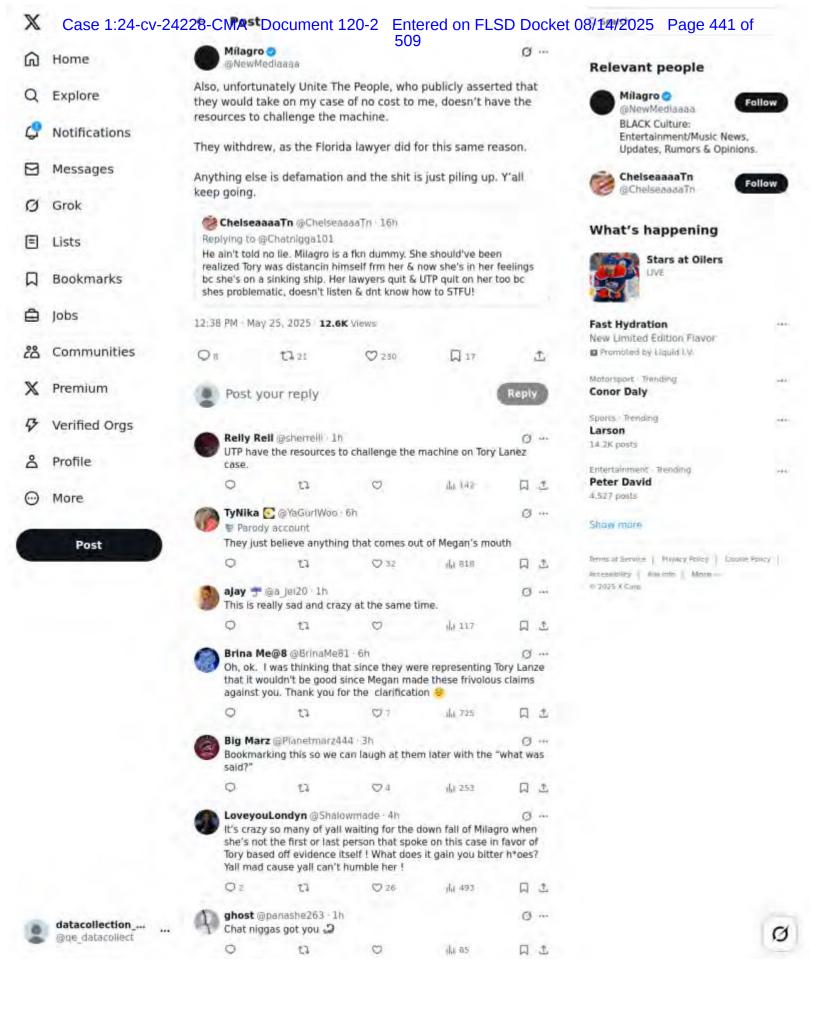
Chrome/126.0.6478.234 Safari/537.36

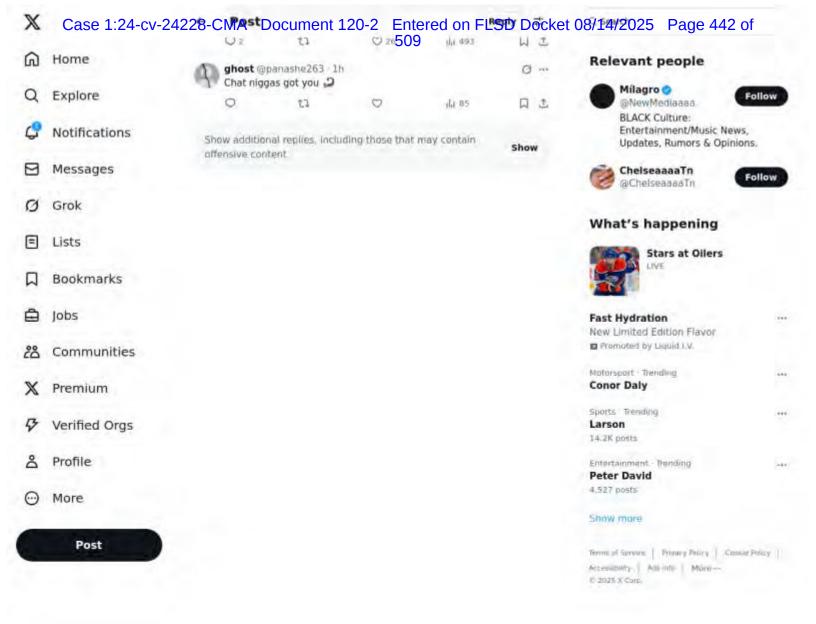
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Exhibit 112
RONNY ZAVOSKY

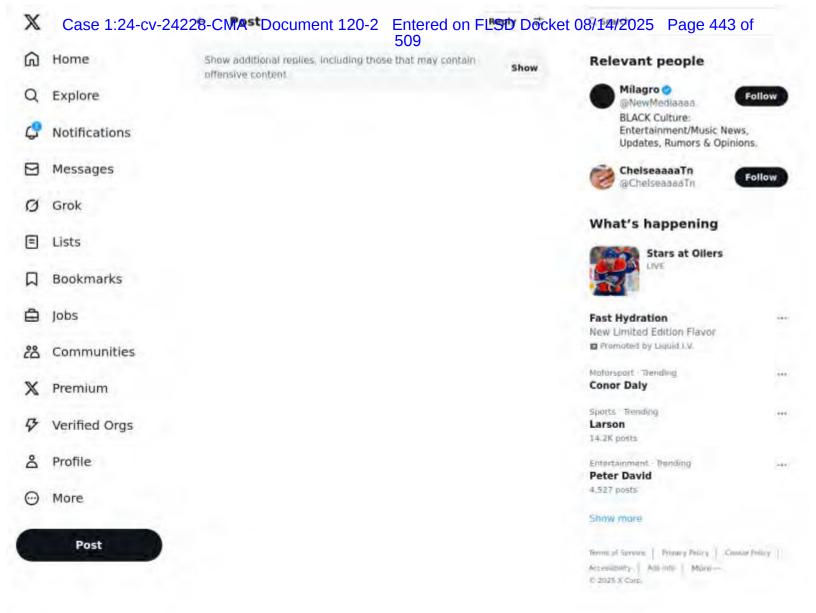
C. MCDOWELL 07.25.25

















Transcript:
File: 00005\_milagrogramz-says-shes-never-helping-tory-or-any-other-man-agai.mp3

Speaker	Time	Dialogue	
	00.00		
Milagro:	00:00	still fucking there. And I hate, and I told y'all I could feel it creeping in, but I hate that I know that I will never go hard for a nigga again in my fucking life, ever, ever. And to have somebody like me, I know how important that is. But when I tell you this has absolutely jaded me, and I would never get up and dah, dah, and ride for a nigga, regardless of if God, I don't want to say I'm going to go against my God because I feel like God for Tory in my heart. But if it came again, bitch, I go against, I fight it until God made it to what I just couldn't ignore it.	
Milagro:	00:47	But I was asking why we were going through everything. Why won't nobody say nothing? Why won't nobody stand? Why won't nobody do this and that? Why, why, why?	
Milagro:	00:55	And then you live and you see. And that's really unfortunate when you got a bitch with heart that's willing. But fool me once, shame on you, fool me twice. Bitch, can't get fooled again, so.	
Milagro:	01:10	I hate every nigga that won't have my support moving forward, that's what I hate.	
Milagro:	01:15	Honestly, and truly, I hate every nigga that won't have a Milagro in that corner. And I hate all the people that took a Milagro for granted, too. I appreciate you so much. I'm finna going to go and smoke. I love you.  END OF AUDIO	

Case 1:24-cv-24228-CMA Document 120-2 Entered on FLSD Docket 08/14/2025 Page 445 of 509 Page Vault —

Document title: Advisory Members — Unite The People Inc.

Capture URL: https://unitethepeople.org/advisory-members

Page loaded at (UTC): Wed, 23 Jul 2025 18:38:33 GMT

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Chrome/138.0.7204.97 Safari/537.36

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Display Name: brandondietzman

C. MCDOWELL 07.25.25 Exhibit 114

RONNY ZAVOSKY

# **Advisory Members**



#### CEASAR MCDOWELL

A formerly incarcerated person who has dedicated his life to assisting the disadvantaged community as well as promote social justice in the United States. A native of Rialto California Ceasar has and is while incarcerated and since released dedicated his himself to assisting incarcerated and formerly incarcerated people with legal issues and working to Unite the People, all the People across the United states and beyond.



#### MITCH MCDOWELL

Mitchell McDowell is the founding member of Unite the People. His vision for the organization is to advance social justice in the United States through organizing in the community service sector and promoting affordable legal services for all. Mitchell has 25 years of experience as the owner of a bail assistance organization, where he helped reunite hundreds of families and restore the presumption of innocence for the accused, and has also managed several community service organizations before founding UTP. Mitch also served in the United State 🤚 How can I help you?





#### DANIELLE FROST

A Los Angeles native, Danielle Frost is the CEO of A Frostchild Production and a Co-Founder of Athletes For Impact. Ms. Frost has over 20 years of experience working closely with professional athletes most notably in the production of purpose-driven sports and entertainment events with an emphasis on community and charitable efforts. Danielle produces impactful events and specializes in strategic partnerships, sponsorship, brand integration, marketing and experiential activations with many leading brands and Fortune 500 companies. Her work has garnered substantial funding to support positive efforts and initiatives in the areas of, but not limited to hunger, community resources, health, fitness, and education both nationally and internationally. Danielle has spoken at Harvard University to discuss the pathways to activism for the aspiring professional. She has been recognized as a pioneer of events in Las Vegas, NV through her work and granted a key to the city. She has also been recognized by the Anguilla Parliamentary Secretary of Sports for her international work in Anguilla with the Youth Sports Foundation and was most recently awarded the Sports Event Producer of the year by the Sports & Music Reunion.

As a co-founder of Athletes For Impact, Danielle works together with grassroots organizations and professional athletes that are committed to social change by creating mindful and informative campaigns to educate and activate community efforts towards justice. She is the co-creator and producer of the Athletes For Impact Awards, an event that honors and recognizes athletes and organizations for their work and impact in the community and in the world. Danielle has been granted a Congressional Certificate of Recognition by the United States Congress for her social action locally and nationally with Athletes For Impact.

Danielle serves as a proud board member of Unit How can I help you? A organization that offers low-cost legal services and provides community resources for under served communities. She believes the time you spend

Danielle serves as a proud board member of Unite the People, a non-profit organization that offers low-cost legal services and provides community resources for under served communities. She believes the time you spend every day working should be a reflection of your purpose, passion, integrity, character, and the fundamentals of what you truly believe in. As a well-recognized professional in the business of sports, entertainment, and activism, she takes pride in her work and is honored to collaborate alongside many conscious change-makers of our time. Danielle enjoys spending time with her family, helping others, and is a dedicated member of her community.



#### MARI RONQUILLO

Classy, savvy, driven and intelligent, Mari Ronquillo has proven to be one of the leading publicists and business owners for over a decade in the field of public relations. Breaking barriers not only as a woman making moves in a male dominated arena, but Ronquillo stands out as younger than many others in the game as well as a leading Latina in the industry. Representing A-list clients from Billboard Icon Award recipient and Hollywood Walk of Fame singer/actress Jennifer Lopez, Grammy Award-winning artist Chris Brown, Academy Award-winning actress Halle Berry, Latin Grammy Award- nominee Sech, Tainy, T-Pain, French Montana, Lakeith Stanfield and a number of others including heavy hitting corporations such as Live Nation, Pepsi and Seagrams Escapes, it is no mystery why that Lyme Lite Media, run by Mari Ronquillo, is one of the first word of mouth sought after boutique public relation firms recommended.

Ronquillo established Lyme Lite Media and Public Relations in 2007. She is no stranger to hard work and dedication as she is the product of two immigrant parents. Her mother, originally from Mexico, and father, originally from the Philippines, instilled these characteristics as well as passion into her at an early age. It is something that carried over into her everyday life as well as business practices. Earning a rare position as an intern producer at 93.5 KDAY in Los Angeles, CA, Mari realized that her gift was far more than production, but to help artists generate exposure. These gifts were brought even more to the forefront as she was given the opportunity to be the event coordinator for one of the biggest concerts that year. Stepping out on faith, after graduating from California State University, Nor How can I help you? Media Production, Ronquillo birthed

impact was felt as she worked Tyga, his hit single "Rack City" and

given the opportunity to be the event coordinator for one of the Entered on FLSD Docket 08/14/2025. Page 449 of Endbiggest concerts that year. Stepping out on faith, after graduating

from California State University, Northridge with a B.A. in Multi-Media Production, Ronquillo birthed her company. Her immediate impact was felt as she worked Tyga, his hit single "Rack City" and his Careless World Tour, catapulting his popularity to new heights. From there Lyme Lite Media became the publicity team for countless top trending superstars and businesses.

Not only is Mari a successful businesswoman, but she also wears the title of mother as her other full-time position; raising her amazing six year old son. The mompreneur is extremely passionate about helping women of color like herself navigate their journey in the Entertainment Industry. A veteran in the game, Ronquillo continues to lead by example and touch the lives of everyone she encounters.



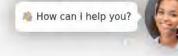
#### TORY LANEZ

Daystar Peterson, better known by his stage name Tory Lanez, is a very prominent rapper, singer, and record producer. Mr. Peterson uses his platform to help Unite the People and his community bring attention to issues such as social justice, and prison reform. Mr. Peterson has played a large role in spreading the word of Unite the People's causes and push for legislation change.

Tory Lanez, is a Canadian rapper, singer, and record producer. He received initial recognition from the mixtape Conflicts of My Soul: The 416 Story, released in August 2013. In 2015, Tory Lanez signed to record producer Benny Blanco's Mad Love Records through Interscope Records.

Mr. Lanez's debut studio album, I Told You (2016), included the singles "Say It" and "Luv", which peaked at number 23 and 19 on the Billboard Hot 100, respectively. In 2018, Mr. Lanez released his second and third studio albums, Memories Don't Die and Love Me Now?. His fourth studio album Chixtape 5 (2019) peaked at number 2 on the US Billboard 200. In 2020, he released his fifth studio album Daystar, which debuted at number 10 on the Billboard 200 and featured controversial responses to the allegations of him shooting fellow rapper Megan Thee Stallion earlier that year.

Mr. Lanez has won and been nominated for many awards and accolades. He received a Grammy Award nomination for his song "LUV" as well as four Juno Awards.







#### TODD PERRY II

Todd L. Perry II joins *Unite The People* as a board member and will focus efforts on building out a presence for the non-profit in Pennsylvania where he intends to commit his time to helping serve those who are adversely affected by the justice system in Pennsylvania. Born and raised in Philadelphia, PA Todd had an early fascination with business and music. He went on to attend Morehouse College in Atlanta, GA where he earned a Bachelor's Degree in English.

Todd is currently a music executive and entrepreneur currently serving as Vice President Of A&R and Business Development for Create Music Group (2020 Inc. Magazine #2 Fastest Growing Company in The United States). Todd began his music career in 2012 under the direction of music executive, Laney Stewart (Tricky Stewart, The-Dream) where he started as an intern for Music Gallery / UMPG Publishing Co. Todd assisted Laney in building and developing songwriters and producers who went on to pen hits for Meek Mill, Jeremih, Jesse McCartney, G-Eazy, Ty Dolla Sign and many others.

In 2018, Todd joined management company Mouvement and built out an A&R department that led to creating records for Chris Brown (Heartbreak On A Full Moon, 2x Platinum), Tinashe, Cat Dealers, Steve Aoki and The-Dream.

Todd joined Create Music Group as Vice President Of A&R in 2020 and is most noted for signing Tory Lanez and releasing, *DAYSTAR*, which debuted at #10 on the Billboard Top 200 Albums.

Todd has a passion for advocacy and providing resources for those who aren't afforded fair opportunities. Todd intends on leveraging his network in politics and music to help make a difference in the lives of incarcerated black and latino inmates.



#### TNI JACKSON

Tni Jackson was born and raised in Los Angeles, but has called the Bay Area her home for over 25 years.

After graduating from Cal Poly, San Luis Obispo, she moved to the Bay Area and started her long and diverse career in real estate.

She started out as a Real Estate Appraiser for a bank, before opening her own Real Estate Apprais

How can I help you?

California Real Estate Sales License and participated on a ceam that specialized in assisting first-time buyers with their dream of

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TNI JACKSON

Tni Jackson was born and raised in Los Angeles, but has called the Bay Area her home for over 25 years.

After graduating from Cal Poly, San Luis Obispo, she moved to the Bay Area and started her long and diverse career in real estate. She started out as a Real Estate Appraiser for a bank, before opening her own Real Estate Appraisal Company. She also has a California Real Estate Sales License and participated on a team that specialized in assisting first-time buyers with their dream of purchasing and owning a home. Education is important to her. She volunteered for years in STEM educational programs for underrepresented K-12 students.

Tni is a proud mom of two beautiful children. Her daughter graduated from Purdue University with a degree in Biological Engineering and her son is a Junior at San Jose State majoring in Materials Engineering. She is honored to serve as an Advisory Member and looks forward to bringing her work ethic and passion to Unite the People.



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Tax Exempt EIN #82-2750315

Office Hours:

M-Th 10am - 4pm

Fri 10am - 3pm

OFFICE VISITS BY APPOINTMENT ONLY

#### INFO

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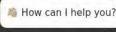
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Yeah, Bott said that but I don't know that that statement is any transcript, when I heard it, I wondered if he was grandstanding for the jury. I don't know if that is accurate.

On this other issue, I guess it's already out there. I guess it is already public knowledge and should be shared with the Mob.

Dec 10, 2022 of 10:36 AM

Confirmation Number

D854VK

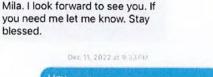
Flight 1 of 2 UA1578 Class: United Economy (V)

Sun Dec 11 2022 Sun Dec 11 2022

O4:56 PM O6:43 PM

I come in on Sunday evening and will be at The Conrad

Dec 11, 2022 at 101PM



Hey.

Finally in my room and safe.

Is there anything I need to do for tomorrow or a certain place I need to be?

I'm driving get in touch shortly

Dec 12, 2022 at 9 42 AN

Address for the Los Angeles Superior Court. 210 West Temple Street LA 90012 Time is 10:30am we will be there by 10:15am so we can walk in together.

Dec 12, 2022 at 1108 AM



2, 2022 at 11 08 AN

Hi Mila, I was notified that court is 10am

Ok what department

D

Sorry Mila. 15th floor. Call me if you need me before 10

Dec 21, 2022 at 8:58 PM

Dec 27, 2022 at 11 35 PM

Hi Mila, call me when you get this. Thanks.

Ope 28, 2022 at 11:23 AM

Awesome day to you Daughter. Please hit me back soon.

Jan 5, 2023 at 1 43 PM

Hi Mila, call me asap.

Just sent the email over

Okay cool. Wish we were presently

DEF MG - 000219



oli











AO 88A (Rev. 12/20) Subpoena to Testify at a Deposition in a Civil Action



# UNITED STATES DISTRICT COURT

for the

Southern District of Florida

Southern District of Florida					
Megan Pete  Plaintiff  V.  Milagro Elizabeth Cooper  Defendant	Civil Action No. 1:24-cv-24228-CMA				
SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION					
Ceasar McDowell					
(Name of person to whom the	nis subpoena is directed)				
Testimony: YOU ARE COMMANDED to appear at the deposition to be taken in this civil action. If you are an organizate party serving this subpoena about the following matters, or those or more officers, directors, or managing agents, or designate other these matters:	ion, you must promptly confer in good faith with the set forth in an attachment, and you must designate one				
Place: 865 South Figueroa Street, 10th Floor	Date and Time:				
Los Angeles, CA 90017	7/25/2025 10:00 am				
The deposition will be recorded by this method:  Court  Production: You, or your representatives, must also bring electronically stored information, or objects, and must permaterial: See Attachment A.					
The following provisions of Fed. R. Civ. P. 45 are attach Rule 45(d), relating to your protection as a person subject to a su respond to this subpoena and the potential consequences of not d Date:	bpoena; and Rule 45(e) and (g), relating to your duty to oing so.				
	/s/ Marie Hayrapetian				
Signature of Clerk or Deputy Clerk	Attorney's signature				
The name, address, e-mail address, and telephone number of the Marie Hayrapetian, Quinn Emanuel Urquhart & Sullivan; 865 S. Fi	, who issues or requests this subpoena, are:				
mariehayrapetian@quinnemanuel.com; (213) 443-3000					
Notice to the person who issues or requests this subpoena					

If this subpoena commands the production of documents, electronically stored information, or tangible things before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4). AO 88A (Rev. 12/20) Subpoena to Testify at a Deposition in a Civil Action (Page 2)

Civil Action No. 1:24-cv-24228-CMA

### PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this su (date)	ubpoena for (name of individual and title, if an	ny)		
☐ I served the s	ubpoena by delivering a copy to the nar	ned individual as follow	/s:	
		on (date)	; or	
☐ I returned the	subpoena unexecuted because:			
tendered to the v	pena was issued on behalf of the United witness the fees for one day's attendance		•	
fees are \$	for travel and \$	for services, fo	or a total of \$	0.00
I declare under p	penalty of perjury that this information i	s true.		
te:		Server's signa	tura	
		server s signal	ште	
		Printed name an	d title	
		Server's addr	ess	

Additional information regarding attempted service, etc.:

AO 88A (Rev. 12/20) Subpoena to Testify at a Deposition in a Civil Action (Page 3)

### Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

### (c) Place of Compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- **(B)** within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
- (ii) is commanded to attend a trial and would not incur substantial expense.

#### (2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
  - **(B)** inspection of premises at the premises to be inspected.

#### (d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

### (2) Command to Produce Materials or Permit Inspection.

- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- **(B)** Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

### (3) Quashing or Modifying a Subpoena.

- (A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:
  - (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
  - (iv) subjects a person to undue burden.
- **(B)** When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or
- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.
- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
  - (ii) ensures that the subpoenaed person will be reasonably compensated.

### (e) Duties in Responding to a Subpoena.

- (1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:
- (A) *Documents*. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
- **(B)** Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.
- (C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.
- **(D)** Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

### (2) Claiming Privilege or Protection.

- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
  - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- (B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

### (g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

For access to subpoena materials, see Fed. R. Civ. P. 45(a) Committee Note (2013).

## ATTACHMENT A TO THE SUBPOENA TO TESTIFY AT A DEPOSITION TO CEASAR MCDOWELL

Pursuant to Federal Rule of Civil Procedure 45 and the accompanying subpoena ("Subpoena"), you are hereby requested to produce for inspection and copying the Documents and Communications identified below.

### **DEFINITIONS**

Unless otherwise defined, all phrases and words herein shall be accorded their usual meaning and shall be interpreted in their common, ordinary sense. However, for purposes of this Subpoena, the words set forth below shall be defined as follows:

- or written statement, dialogue, discussion, exchange, conversation, disclosure, or transmittal of information whether in-person, by telephone, any form of video transmission, mail, e-mail, facsimile, personal delivery, computer transmission, or otherwise. For the avoidance of doubt, the term Communication shall encompass emails, pictures, photographs, recordings, text messages, messages exchanged on any communicative or social media application (*e.g.*, WhatsApp, iMessage, Slack, Facebook Messenger, Google Messages, Microsoft Teams, Zoom, Cisco WebEx, Signal, Line, WeChat, Wickr, Snapchat, Telegram), face-to-face meetings, telephone conversations, or any other means of capturing information.
- 2. "Daystar Peterson" refers to Daystar Peterson, the defendant in the criminal case, *People v. Daystar Peterson*, Case No. BA490599, held before the Los Angeles Superior Court. This criminal action resulted in Daystar Peterson's conviction for three felony counts: (1) assault with a semiautomatic handgun; (2) carrying a loaded, unregistered firearm in a vehicle; and (3) discharging a firearm with gross negligence.
  - 3. **"Sonstar Peterson"** refers to Sonstar Peterson, the father of Daystar Peterson.

- 4. "**Defendant**" refers to Milagro Elizabeth Cooper, the Defendant in the litigation titled *Megan Pete v. Milagro Elizabeth Cooper*, Case No. 1:24-cv-24228-CMA, pending before the United States District Court, Southern District of Florida.
- 5. "Defendant's Family" refers to Defendant Milagro Elizabeth Cooper's family members, including but not limited to her children, spouse, significant other, parents, or grandparents.
- "Documents" shall have the broadest meaning ascribed to them by Federal Rule 6. of Civil Procedure 34 and Federal Rule of Evidence 1001. The terms shall include any information recorded in any medium, including electronically stored information, whether original, draft, or non-identical copy (i.e., whether different from the original by reason of notations made on each copy or otherwise); whether written, sound or video-recorded, or displayed graphically; whether privileged or otherwise excludable from discovery; and includes, without limitation: notes; data (raw or manipulated); lists; customer lists; itineraries; letters; correspondence; communications of any nature; drawings; designs; telegrams; manuals; books of accounts; purchase orders; order acknowledgements; invoices; checks; money orders; credit memoranda; debit memoranda; contracts; agreements; studies; tabulations; charts; graphs; photographs; photostats; mimeographs; typewriting; painting; graphic reproductions; film; handwriting; videotape recordings; audio tape recordings; compact discs; analyses; books; articles; magazines; newspapers; booklets; circulars; bulletins; notices; computer files, whether on hard or floppy disk, compact disc, tape, or other computer storage devices; computer printouts of any form whatsoever; letters of introduction; letters of referral; summaries; questionnaires and surveys; memoranda; notebooks of any character; summaries or records of personal conversations; telephone records, text messages, emails, calendars; Day-Timers; diaries; logs; routing slips or memoranda; reports; publications;

notes; minutes or records of meetings and all other communications of any type, including interoffice and intra-office communications; transcripts of oral testimony or statements; affidavits;
reports and/or summaries of investigations; agreements and contracts, including all modifications
and/or revisions thereof; working papers; reports and/or summaries of negotiations; court papers;
brochures; pamphlets; press releases; drafts or revisions of drafts or translations; records and
dictation tapes; and all tangible items where information is recorded or likely to be recorded. Any
document with any marginalia or marks on any sheet or side thereof, including without limitation,
initials, stamped indicia, any comment or any notation of any character and not a part of the
original text, or any reproduction thereof, is considered to be a separate document for purposes of
this request.

- 7. "Item of Value" refers to any object given by Daystar Peterson or Sonstar Peterson to Defendant, including but not limited to automobiles, clothing, jewelry, travel expenses, dining, children's toys, and payment of rent, utilities, cellular phone, or other bills.
- 8. "Payment" means any financial activity between Daystar Peterson, Sonstar Peterson, and Defendant, including but not limited to all deposits, monetary transfers, wires, withdrawals, checks received and written, direct deposits to any bank account(s) or using any financial service, including but not limited to PayPal, Venmo, Cash App, Chime, and Zelle.
- 9. "Ms. Pete" refer to Megan Pete, the Plaintiff in the litigation titled *Megan Pete v*. *Milagro Elizabeth Cooper*, Case No. 1:24-cv-24228-CMA, pending before the United States District Court, Southern District of Florida.
  - 10. "You" and "Your" refer to you, Ceasar McDowell.

## **INSTRUCTIONS**

1. This Subpoena applies to all Documents in your possession, custody, or control, regardless of their location and irrespective of whether such Documents are held by your officers,

employees, attorneys, accountants, consultants, representatives, agents, or any other Person. You are requested to make a diligent search of your records and other papers and materials in your possession to the extent necessary to provide responsive Documents. Unless otherwise indicated, this Subpoena seeks all Documents that were created or received by you at any time between October 8, 2020 through the present.

- 2. This Subpoena contains continuing requests. Should you become aware of or acquire possession, custody, or control of additional responsive Documents, you shall promptly produce these additional Documents for inspection and copying.
- 3. This Subpoena seeks production of each Document in its entirety, without abbreviation or redaction, including, without limitation, all attachments, transmittal sheets, notes, cover letters, exhibits, enclosures, and all drafts and non-identical copies of each Document.
- 4. If you object to any portion of any request, identify the portion to which you object, answer the remainder, and produce all Documents and parts.
- 5. If you object to any request as overly broad or unduly burdensome, produce those Documents which are unobjectionable and specifically identify why you believe any request is overly broad or unduly burdensome.
  - 6. If you do not possess any Documents responsive to a particular request, so state.
- 7. If production of any Document is withheld on a basis of a claim of privilege, each withheld Document shall be separately identified in a privileged document list. The privileged document list must identify each Document separately, specifying for each Document at least: (i) the date the information was created or communicated; (ii) author(s)/sender(s); (iii) all recipient(s); and (iv) the general subject matter contained in the Document. The sender(s) and recipient(s) shall be identified by position and entity (corporation, firm, partnership, etc.) with which they are

employed or associated. If the sender or recipient is an attorney, they shall be so identified. The type of privilege claimed must also be stated, together with a certification, that all elements of the claimed privilege have been met and have not been waived with respect to each Document.

- 8. Each Document shall be produced in its entirety, including all attachments and disclosures. A Document with handwritten, typewritten, or other recorded notes, editing marks, etc., is a separate, unique Document and is not and shall not deemed to be identical to one without such additions, deletions, or modifications. If any portion of a Document is responsive to a request, produce the entire Document, including all attachments, enclosures, 'post-it' type notes, and any other matter physically attached to the Document. If a responsive Document cannot be produced in full, it shall be produced to the extent possible with an explanation stating why the production of the remainder is not possible.
- 9. All Documents produced in response to this Subpoena shall be produced in the same order as they are maintained in the ordinary course of business and, where attached, shall not be separated or disassembled.
- 10. Electronically stored information ("ESI") should be produced in single-page, black and white, TIFF Group IV, 300 DPI TIFF images with the exception of spreadsheet type files, source code, and audio and video files, which should be produced in native format. If a document is produced in native format, a single-page Bates-stamped image slip stating the document has been produced in native format should also be provided. A load file of the ESI should be included with metadata fields to be mutually agreed upon by the parties.
- 11. Each request shall be construed independently, and no request shall be viewed as limiting the scope of any other request.

- 12. Whenever necessary to bring documents within the scope of these Document Requests that might otherwise be construed to be outside their scope:
  - i. the use of a verb in any tense shall be construed as the use of that verb in all other tenses;
  - ii. the use of a word in its singular form shall be deemed to include within its use the plural form as well;
  - iii. unless otherwise stated explicitly herein with regard to a particular Document Request, each Document Request shall be construed independently and not with reference to any other Document Request for the purpose of limitation. The use of the singular form of any word includes the plural and vice versa. The past tense shall include the present tense and vice versa;
  - iv. the connectives "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of a Document Request all documents that might otherwise be construed to be outside its scope;
  - v. the use of any capitalized word shall include the same word uncapitalized, and the use of any uncapitalized word shall include the same word capitalized; and
  - vi. the terms "all" and "each" shall be construed as all and each.

## **DOCUMENTS REQUESTED**

- 1. All Documents and Communications between You and Defendant that refer or relate to Ms. Pete.
- 2. All Documents and Communications between You and Sonstar Peterson that refer or relate to Defendant.
- 3. All Documents and Communications between You and Daystar Peterson that refer or relate to Defendant.
- 4. All Documents and Communications that refer or relate to any Payments and/or Items of Value given to Defendant.
- 5. All Documents and Communications that refer or relate to any Payments and/or Items of Value given to Defendant's Family.

Dated: July 2, 2025

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## /s/ Marie Hayrapetian

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# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

### CASE NO. 24-24228-CIV-ALTONAGA

MEGAN PETE,

Plaintiff,

V.

MILAGRO ELIZABETH COOPER,

Defendant.



### ORDER

THIS CAUSE came before the Court on the Joint Motion for Entry of Stipulated Protective Order [ECF No. 39]. Being fully advised, it is

ORDERED AND ADJUDGED that the Motion is GRANTED as follows:

### 1. PURPOSES AND LIMITATIONS

Disclosure and discovery activity in this action are likely to involve production of confidential, proprietary, or private information for which special protection from public disclosure and from use for any purpose other than prosecuting this litigation may be warranted. Accordingly, the parties, by and through their undersigned counsel, having met and conferred, hereby stipulate to and petition the court to enter the following Stipulated Protective Order (the "Order").

The parties acknowledge that this Order does not confer blanket protections on all disclosures or responses to discovery and that the protection it affords from public disclosure and use extends only to the limited information or items that are entitled to confidential treatment under the applicable legal principles. The parties further acknowledge, as set forth in Section 12.3, below, that the procedures for filing any Protected Material, as defined herein, shall be

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governed by S.D. Fla. Local Rule 5.4 sets forth the procedures that must be followed and the standards that will be applied when a party seeks permission from the court to file material under seal.

### 2. DEFINITIONS

- 2.1 Challenging Party: a Party or Non-Party that challenges the designation of information or items under this Order.
- 2.2 "CONFIDENTIAL" Information or Items: information (regardless of how it is generated, stored or maintained) or tangible things, shall include any non-public, sensitive business proprietary, or sensitive personal information (including personal financial information), including electronically stored information, documents subject to a separate confidentiality obligation owed by a Producing Entity to a third party; or other information, or which the Producing Entity otherwise believes in good faith to be entitled to protection under Florida or federal law.
- 2.3 "HIGHLY CONFIDENTIAL ATTORNEYS' EYES ONLY" Information or Items: Extremely sensitive "Confidential Information or Items" (regardless of how it is generated, stored or maintained), including electronically stored information, that a designating party believes in good faith to consist of highly proprietary business, strategic, proprietary, financial commercially sensitive business information, or medical information, or information subject to confidentiality restrictions, trade secrets, or other similar information that is substantially likely to cause injury to the commercial, financial, strategic, or business interests of such producing party or its employees, customers, or clients if disclosed.
- 2.4 Counsel (without qualifier): Outside Counsel of Record (as well as their support staff).

- 2.5 Designating Party: a Party or Non-Party that designates information or items that it produces in disclosures or in responses to discovery as "CONFIDENTIAL" Or "HIGHLY CONFIDENTIAL."
- 2.6 Disclosure or Discovery Material: all items or information, regardless of the medium or manner in which it is generated, stored, or maintained (including, among other things, testimony, transcripts, and tangible things), that are produced or generated in disclosures or responses to discovery in this matter.
- 2.7 Expert: a person with specialized knowledge or experience in a matter pertinent to the litigation who has been retained by a Party or its counsel to serve as an expert witness or as a consultant in this action.
- 2.8 Non-Party: any natural person, partnership, corporation, association, or other legal entity not named as a Party to this action.
- 2.9 Outside Counsel of Record: attorneys who are not employees of a party to this action but are retained to represent or advise a party to this action and have appeared in this action on behalf of that party or are affiliated with a law firm which has appeared on behalf of that party.
- 2.10 Party: any party to this action, consultants, retained experts, and Outside Counsel of Record (and their support staffs).
- 2.11 Personally Identifiable Information: Customer names, Social Security numbers, account numbers, telephone numbers, mailing addresses, and email addresses.
- 2.12 Producing Party: a Party or Non-Party that produces Disclosure or Discovery Material in this action.

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- 2.13 Professional Vendors: persons or entities that provide litigation support services (e.g., photocopying, videotaping, translating, preparing exhibits or demonstrations, and organizing, storing, or retrieving data in any form or medium) and their employees and subcontractors.
- 2.14 Protected Material: any Disclosure or Discovery Material that is designated as "CONFIDENTIAL" Or "HIGHLY CONFIDENTIAL."
- 2.15 Receiving Party: a Party that receives Disclosure or Discovery Material from a Producing Party.

### 3. SCOPE

The protections conferred by this Stipulation and Order cover not only Protected Material (as defined above), but also (1) any information copied or extracted from Protected Material; (2) all copies, excerpts, summaries, or compilations of Protected Material; and (3) any testimony, conversations, or presentations by Parties or their Counsel that might reveal Protected Material. However, the protections conferred by this Stipulation and Order do not cover the following information: (a) any information that is in the public domain at the time of disclosure to a Receiving Party or becomes part of the public domain after its disclosure to a Receiving Party as a result of publication not involving a violation of this Order, including becoming part of the public record through trial or otherwise; and (b) any information known to the Receiving Party prior to the disclosure or obtained by the Receiving Party after the disclosure from a source who obtained the information lawfully and under no obligation of confidentiality to the Designating Party. Any use of Protected Material at trial shall be governed by a separate agreement or order.

### 4. DURATION

Even after final disposition of this litigation, the confidentiality obligations imposed by this Order shall remain in effect until a Designating Party agrees otherwise in writing or a court order otherwise directs. Final disposition shall be deemed to be the later of (1) dismissal of all claims and defenses in this action, with or without prejudice; and (2) final judgment herein after the completion and exhaustion of all appeals, rehearings, remands, trials, or reviews of this action, including the time limits for filing any motions or applications for extension of time pursuant to applicable law.

### 5. DESIGNATING PROTECTED MATERIAL

5.1 Exercise of Restraint and Care in Designating Material for Protection. Each Party or Non-Party that designates information or items for protection under this Order must take care to limit any such designation to specific material that qualifies under the appropriate standards. To the extent it is practicable to do so, the Designating Party must designate for protection only those parts of material, documents, items, or oral or written communications that qualify – so that other portions of the material, documents, items, or communications for which protection is not warranted are not swept unjustifiably within the ambit of this Order.

Designations that are shown to be clearly unjustified or that have been made for an improper purpose (e.g., to unnecessarily encumber or retard the case development process or to impose unnecessary expenses and burdens on other parties) may expose the Designating Party to sanctions pursuant to applicable law.

If it comes to a Designating Party's attention that information or items that it designated for protection do not qualify for protection, that Designating Party must promptly notify all other Parties that it is withdrawing the mistaken designation.

5.2 Manner and Timing of Designations. Except as otherwise provided in this Order (see, e.g., second paragraph of section 5.2(a) below), or as otherwise stipulated or ordered, Disclosure or Discovery Material that qualifies for protection under this Order must be clearly so designated before the material is disclosed or produced.

Designation in conformity with this Order requires:

5.2.1 For information in documentary form (e.g., paper or electronic documents, but excluding transcripts of depositions or other pretrial or trial proceedings), that the Producing Party affix the legend "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL" to each page that contains protected material except as otherwise set forth in other orders adopted in this Action. If only a portion or portions of the material on a page qualifies for protection, the Producing Party also must clearly identify the protected portion(s) (e.g., by making appropriate markings in the margins).

A Party or Non-Party that makes original documents or materials available for inspection need not designate them for protection until after the inspecting Party has indicated which material it would like copied and produced. During the inspection and before the designation, all of the material made available for inspection shall be deemed "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL" as determined by the Producing Party. After the receiving Party has identified the documents it wants copied and produced, the Producing Party must determine which documents, or portions thereof, qualify for protection under this Order. Then, before producing the specified documents, the Producing Party must affix the "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL" legend to each page that contains Protected Material. If only a portion or portions of the

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material on a page qualifies for protection, the Producing Party also must clearly identify the protected portion(s) (e.g., by making appropriate markings in the margins).

5.2.2 All deposition testimony shall presumptively be treated as HIGHLY CONFIDENTIAL and subject to this Stipulation during the deposition and for a period of thirty (30) calendar days after a final transcript of said deposition is received by counsel for each of the parties. For testimony given in a deposition or in other pretrial or trial proceedings the Designating Party shall identify on the record or up to 30 days after a final transcript of the testimony has been received by counsel for each of the parties (or a period otherwise agreed upon) all Protected Material, including specifying whether any portions of the transcript or the entire transcript shall be treated as "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL." Notwithstanding any of the foregoing, parties to this Action who are natural persons may attend and observe depositions in this Action.

The use of a document as an exhibit at a deposition shall not in any way affect its designation as "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY." If, after the 30-day period (or otherwise agreed upon), no Party has designated some or all of the deposition transcript as Protected Material under this Order, the entire deposition, or those portions of the deposition not designated as Protected Material, will no longer be considered confidential. If any party or non-party wishes to use information at a deposition that is designated HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY – any persons who are attending the deposition and who do not fall within one of the categories listed in Section 7.3 of this Stipulation must, upon request, leave the deposition room while such information is being discussed.

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- 5.2.3 for information produced in some form other than documentary and for any other tangible items, that the Producing Party affix in a prominent place on the exterior of the container or containers in which the information or item is stored the legend "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL." If only a portion or portions of the information or item warrant protection, the Producing Party, to the extent practicable, shall identify the protected portion(s).
- 5.3 Inadvertent Failures to Designate. If timely corrected, an inadvertent failure to designate qualified information or items does not, standing alone, waive the Designating Party's right to secure protection under this Order for such material. Upon timely correction of a designation, the Receiving Party must make reasonable efforts to assure that the material is treated in accordance with the provisions of this Order.

### 6. CHALLENGING CONFIDENTIALITY DESIGNATIONS

- 6.1 Timing of Challenges. Any Party or Non-Party may challenge a designation of confidentiality at any time. Unless a prompt challenge to a Designating Party's confidentiality designation is necessary to avoid foreseeable, substantial unfairness, unnecessary economic burdens, or a significant disruption or delay of the litigation, a Party does not waive its right to challenge a confidentiality designation by electing not to mount a challenge promptly after the original designation is disclosed.
- 6.2 Meet and Confer. The Challenging Party shall initiate the dispute resolution process by providing written notice of each designation it is challenging and describing the basis for each challenge. To avoid ambiguity as to whether a challenge has been made, the written notice must recite that the challenge to confidentiality is being made in accordance with this specific paragraph of the Protective Order. The parties shall attempt to resolve each challenge in

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good faith and must begin the process by conferring directly (in voice to voice dialogue; other forms of communication are not sufficient) within 14 days of the date of service of notice. In conferring, the Challenging Party must explain the basis for its belief that the confidentiality designation was not proper and must give the Designating Party an opportunity to review the designated material, to reconsider the circumstances, and, if no change in designation is offered, to explain the basis for the chosen designation. A Challenging Party may proceed to the next stage of the challenge process only if it has engaged in this meet and confer process first or establishes that the Designating Party is unwilling to participate in the meet and confer process in a timely manner. Nothing in this paragraph precludes the Parties from agreeing to reasonable extensions at any step of the process described herein.

6.3 Judicial Intervention. If the Parties cannot resolve a challenge without court intervention, the Designating Party shall file and serve a motion to retain confidentiality under the Local Rules within 21 days of the initial notice of challenge or within 14 days of the parties agreeing that the meet and confer process will not resolve their dispute, whichever is earlier, or in the manner designated by the Court's discovery order, including any orders pertaining to discovery challenges entered by a United States Magistrate Judge. Each such motion must be accompanied by a competent declaration affirming that the movant has complied with the meet and confer requirements imposed in the preceding paragraph. Failure by the Designating Party to make such a motion including the required declaration within 21 days (or 14 days, if applicable) shall automatically waive the confidentiality designation for each challenged designation. In addition, the Challenging Party may file a motion challenging a confidentiality designation at any time if there is good cause for doing so, including a challenge to the designation of a deposition transcript or any portions thereof. Any motion brought pursuant to

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this provision must be accompanied by a competent declaration affirming that the movant has complied with the meet and confer requirements imposed by the preceding paragraph.

6.4 The burden of persuasion in any such challenge proceeding shall be on the Designating Party. Frivolous challenges, and those made for an improper purpose (e.g., to harass or impose unnecessary expenses and burdens on other parties) may expose the Challenging Party to sanctions pursuant to applicable law. Unless the Designating Party has waived the confidentiality designation by failing to file a motion to retain confidentiality as described above, all parties shall continue to afford the material in question the level of protection to which it is entitled under the Producing Party's designation until the court rules on the challenge.

## 7. ACCESS TO AND USE OF PROTECTED MATERIAL

7.1 Basic Principles. A Receiving Party may use Protected Material that is disclosed or produced by another Party or by a Non-Party in connection with this case only for prosecuting, defending, or attempting to settle this litigation. Such Protected Material may be disclosed only to the categories of persons and under the conditions described in this Order. When the litigation has been terminated, a Receiving Party must comply with the provisions of section 13 below (FINAL DISPOSITION).

Protected Material must be stored and maintained by a Receiving Party at a location and in a secure manner that ensures that access is limited to the persons authorized under this Order.

7.2 Disclosure of "CONFIDENTIAL" Information or Items. Unless otherwise ordered by the court or permitted in writing by the Designating Party, a Receiving Party may disclose any information or item designated "CONFIDENTIAL" only to:

- 7.2.1 the Receiving Party's Outside Counsel of Record in this action, as well as employees of said Outside Counsel of Record to whom it is reasonably necessary to disclose the information for this litigation;
- 7.2.2 the officers, directors, and employees (including House Counsel) of the Receiving Party to whom disclosure is reasonably necessary for this litigation and who have signed the "Acknowledgment and Agreement to Be Bound" (Exhibit A);
- 7.2.3 Experts (as defined in this Order) of the Receiving Party to whom disclosure is reasonably necessary for this litigation and who have signed the "Acknowledgment and Agreement to Be Bound" (Exhibit A);
- 7.2.4 the Court, Magistrate Judge and their personnel; and any appellate court or other court (and their personnel) before which the Parties appear in this Action;
- 7.2.5 court reporters, videographers, and their staff, professional jury or trial consultants, mock jurors, and Professional Vendors to whom disclosure is reasonably necessary for this litigation and who have signed the "Acknowledgment and Agreement to Be Bound" (Exhibit A);
- 7.2.6 during their depositions, witnesses in the action to whom disclosure is reasonably necessary and who have signed the "Acknowledgment and Agreement to Be Bound" (Exhibit A), unless otherwise agreed by the Designating Party or ordered by the court. Pages of transcribed deposition testimony or exhibits to depositions that reveal Protected Material must be separately bound by the court reporter and may not be disclosed to anyone except as permitted under this Stipulated Protective Order.
- 7.2.7 the author or recipient of a document containing the information or a custodian or other person who otherwise possessed or knew the information.

- 7.2.8 Special masters or discovery referees who may be appointed by the Court;
- 7.2.9 Mediators or settlement officers, and their supporting personnel, subject to the mutual agreement of the Parties engaged in settlement discussions who have signed the "Acknowledgment and Agreement to Be Bound" (Exhibit A).
- 7.2.10 Any other person as to whom the Designating Party has consented to disclosure in advance; and
- 7.2.11 Such other persons as the Parties may agree or may be ordered by the Court.
- 7.3 Disclosure of "HIGHLY CONFIDENTIAL" Information or Items. Unless otherwise ordered by the court or permitted in writing by the Designating Party, a Receiving Party may disclose any information or item designated "HIGHLY CONFIDENTIAL" only to:
  - 7.3.1 the Receiving Party's Outside Counsel of Record in this action, as well as employees of said Outside Counsel of Record to whom it is reasonably necessary to disclose the information for this litigation;
  - 7.3.2 Experts (as defined in this Order) of the Receiving Party to whom disclosure is reasonably necessary for this litigation and who have signed the "Acknowledgment and Agreement to Be Bound" (Exhibit A) unless otherwise agreed in writing by the Designating Party or ordered by the Court;
  - 7.3.3 The Court, Magistrate Judge and their personnel; and any appellate court or other court (and their personnel) before which the Parties appear in this action;
  - 7.3.4 court reporters, videographers, and their staff, professional jury or trial consultants, mock jurors, and Professional Vendors to whom disclosure is reasonably

necessary for this litigation and who have signed the "Acknowledgment and Agreement to Be Bound" (Exhibit A);

- 7.3.5 during their depositions, witnesses in the action to whom disclosure is reasonably necessary and who have signed the "Acknowledgment and Agreement to Be Bound" (Exhibit A), unless otherwise agreed by the Designating Party or ordered by the court. Pages of transcribed deposition testimony or exhibits to depositions that reveal Protected Material must be separately bound by the court reporter and may not be disclosed to anyone except as permitted under this Stipulated Protective Order.
  - 7.3.6 Special masters or discovery referees who may be appointed by the Court;
- 7.3.7 Mediators or settlement officers, and their supporting personnel, subject to the mutual agreement of the Parties engaged in settlement discussions, and who have signed the "Acknowledgment and Agreement to Be Bound" (Exhibit A).
- 7.3.8 the author or recipient of a document containing the information or a custodian or other person who otherwise possessed or knew the information.
- 8. PROTECTED MATERIAL SUBPOENAED OR ORDERED PRODUCED IN OTHER LITIGATION
- 8.1 If a Party is served with a subpoena or a court order issued in other litigation that compels disclosure of any information or items designated in this action as "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL" that Party must:
  - 8.1.1 (a) promptly notify in writing the Designating Party. Such notification shall include a copy of the subpoena or court order;
  - 8.1.2 (b) promptly notify in writing the party who caused the subpoena or order to issue in the other litigation that some or all of the material covered by the subpoena or

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order is subject to this Protective Order. Such notification shall include a copy of this Stipulated Protective Order; and

- 8.1.3 (c) cooperate with respect to all reasonable procedures sought to be pursued by the Designating Party whose Protected Material may be affected.
- 8.2 If the Designating Party timely seeks a protective order, the Party served with the subpoena or court order shall not produce any information designated in this action as "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL" before a determination by the court from which the subpoena or order issued, unless the Party has obtained the Designating Party's permission. The Designating Party shall bear the burden and expense of seeking protection in that court of its confidential material and nothing in these provisions should be construed as authorizing or encouraging a Receiving Party in this action to disobey a lawful directive from another court.
- 9. A NON-PARTY'S PROTECTED MATERIAL SOUGHT TO BE PRODUCED IN THIS LITIGATION
- 9.1 The terms of this Order are applicable to information produced by a Non-Party in this action and designated as "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL." A party may designate as CONFIDENTIAL OR HIGHLY CONFIDENTIAL subject to this Stipulation any document, information, or deposition testimony produced or given by any Non-Party to this case, or any portion thereof. Such information produced by Non-Parties in connection with this Action is protected by the remedies and relief provided by this Order. Nothing in these provisions should be construed as prohibiting a Non-Party from seeking additional protections.

- 9.2 In the event that a Party is required, by a valid discovery request, to produce a Non-Party's confidential information in its possession, and the Party is subject to an agreement with the Non-Party not to produce the Non-Party's confidential information, then the Party shall:
  - 9.2.1 promptly notify in writing the Requesting Party and the Non-Party that some or all of the information requested is subject to a confidentiality agreement with a Non-Party;
  - 9.2.2 promptly provide the Non-Party with a copy of the Stipulated Protective Order in this litigation, the relevant discovery request(s), and a reasonably specific description of the information requested; and
    - 9.2.3 make the information requested available for inspection by the Non-Party.
  - 9.2.4 If the Non-Party fails to object or seek a protective order from this court within 14 days of receiving the notice and accompanying information, the Receiving Party may produce the Non-Party's confidential information responsive to the discovery request. If the Non-Party timely seeks a protective order, the Receiving Party shall not produce any information in its possession or control that is subject to the confidentiality agreement with the Non-Party before a determination by the court. Absent a court order to the contrary, the Non-Party shall bear the burden and expense of seeking protection in this court of its Protected Material.

## 10. UNAUTHORIZED DISCLOSURE OF PROTECTED MATERIAL

If a Receiving Party learns that, by inadvertence or otherwise, it has disclosed Protected Material to any person or in any circumstance not authorized under this Stipulated Protective Order, the Receiving Party must immediately (a) notify in writing the Designating Party of the unauthorized disclosures, (b) use its best efforts to retrieve all unauthorized copies of the

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Protected Material, (c) inform the person or persons to whom unauthorized disclosures were made of all the terms of this Order, and (d) request such person or persons to execute the "Acknowledgment and Agreement to Be Bound" that is attached hereto as Exhibit A.

11. INADVERTENT PRODUCTION OF PRIVILEGED OR OTHERWISE PROTECTED MATERIAL

When a Producing Party gives notice to Receiving Parties that certain inadvertently produced material is subject to a claim of privilege or other protection, the obligations of the Receiving Parties are those set forth in Federal Rule of Civil Procedure 26(b)(5)(B). This provision is not intended to modify whatever procedure may be established in an e-discovery order that provides for production without prior privilege review. Pursuant to Federal Rule of Evidence 502(d) and (e), insofar as the parties reach an agreement on the effect of disclosure of a communication or information covered by the attorney-client privilege or work product protection, the parties may incorporate their agreement in the stipulated protective order submitted to the court.

Any inadvertent production of privileged or otherwise protected material that satisfies Federal Rule of Evidence 502(b) shall not be deemed to have waived the privilege or protection.

### 12. MISCELLANEOUS

- 12.1 Right to Further Relief. Nothing in this Order abridges the right of any person to seek its modification by the court in the future.
- 12.2 Right to Assert Other Objections. By stipulating to the entry of this Order, no Party is waiving any objections to the production of documents or information on any basis, including, without limitation, the right to object to production of information and/or documents that a Party contends are subject to any confidentiality interest of themselves, or third parties,

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such that disclosure should be precluded notwithstanding the protections of this Order (e.g., in the event of a contractual confidentiality provision between the Producing Party and a third party or a protective order between parties or nonparties in another case). Similarly, no Party waives any right to object on any ground to use in evidence of any of the material covered by this Order.

- or a court order secured after appropriate notice to all interested persons, a Party may not file in the public record in this Action any Protected Material. A Party that seeks to file under seal any Protected Material must comply with Local Rule 5.4. The extent of Protected Material included within any such proposed filings under seal shall be limited to the particular items of information and/or portions of documents that are reasonably necessary to the filing. Pursuant to Local Rule 5.4, the proposed sealed material shall not be filed unless the Court grants the motion to file under seal. The motion to file under seal shall specify the proposed duration of the requested sealing. If, prior to the issuance of a ruling on the motion to file under seal, the moving party elects or is required to publicly file a pleading, motion, memorandum, or other document that attaches or reveals the content of the proposed sealed material, then the moving party must redact from the public filing all content that is the subject of the motion to file under seal.
- 12.4 <u>No Effect on Designating Party</u>. This Order shall not apply to and shall not limit in any way any Designating Party's use, disclosure or handling of its own Protected Material.

  Non-Public, Personally Identifiable Information. Producing Party may partially or wholly redact nonpublic, Personally Identifiable Information from any Disclosure of Discovery Material that may contain it.

### 13. FINAL DISPOSITION

Within 60 days after the final disposition of this action, as defined in paragraph 4, each Receiving Party must return all Protected Material to the Producing Party or destroy such material except as otherwise required by Florida Bar record retention requirements. As used in this subdivision, "all Protected Material" includes all copies, abstracts, compilations, summaries, and any other format reproducing or capturing any of the Protected Material. Whether the Protected Material is returned or destroyed, the Receiving Party must submit a written certification to the Producing Party (and, if not the same person or entity, to the Designating Party) by the 60 day deadline that (1) identifies (by category, where appropriate) all the Protected Material that was returned or destroyed and (2) affirms that the Receiving Party has not retained any copies, abstracts, compilations, summaries or any other format reproducing or capturing any of the Protected Material. Notwithstanding this provision. Counsel are entitled to retain an archival copy of all pleadings, motion papers, trial, deposition, and hearing transcripts, legal memoranda, correspondence, deposition and trial exhibits, expert reports, attorney work product, and consultant and expert work product, even if such materials contain Protected Material. Any such archival copies that contain or constitute Protected Material remain subject to this Protective Order as set forth in Section 4 (DURATION).

Notwithstanding language to the contrary in this Protective Order, the parties shall comply with the Scheduling Order [ECF No. 17] and its prohibition on filing discovery motions. Furthermore, the Court does not favor the filing of materials under seal; rather, the parties may redact information they do not wish to have on the public record.

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CASE NO. 24-24228-CR-ALTONAGA

DONE AND ORDERED in Miami, Florida, this 23rd day of February, 2025.

CECILIA M. ALTONAGA

CHIEF UNITED STATES DISTRICT JUDGE

cc: counsel of record

## **EXHIBIT A**

## ACKNOWLEDGMENT AND AGREEMENT TO BE BOUND

Ĭ,	[print or type full name], of	[print or
type full address], declare under pen	nalty of perjury that I have read in its en	tirety and understand
the Stipulated Protective Order that	at was issued by the United States D	istrict Court for the
Southern District of Florida on [date	e] in the case of [insert for	mal name of the case
and the number and initials assigned	d to it by the court]. I agree to comply	with and to be bound
by all the terms of this Stipulated Pro	otective Order and I understand and ack	nowledge that failure
to so comply could expose me to	sanctions and punishment in the nat	ure of contempt. I
solemnly promise that I will not disc	close in any manner any information or i	item that is subject to
this Stipulated Protective Order to	any person or entity except in strict	compliance with the
provisions of this Order.		
I further agree to submit to	the jurisdiction of the United States I	District Court for the
Southern District of Florida for the	purpose of enforcing the terms of this	Stipulated Protective
Order, even if such enforcement pro	ceedings occur after termination of this	action.
I hereby appoint	[print or ty	ype full name] of
	[print or type full add	lress and telephone
number] as my California agent fo	or service of process in connection with	th this action or any
proceedings related to enforcement of	of this Stipulated Protective Order.	
Date:		
City and State where sworn and sign	ned:	
Printed name:		
Signature:		